

# **EXHIBIT 5**

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

WORLD WRESTLING  
ENTERTAINMENT, INC.,

Plaintiff,

vs.

JOHN AND JANE DOES 1-100,  
and XYZ CORPORATIONS 1-100,

Defendants.

Civil Action No.:

**NOTICE TO UNITED STATES  
ATTORNEY OF APPLICATION  
FOR  
EX PARTE SEIZURE ORDER**

**TO THE UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY:**

You are hereby notified, pursuant to 15 U.S.C. § 1116(d)(2), that attorneys for the Plaintiff in the above-captioned Action intend to seek an Ex Parte Order for seizure of counterfeit goods as provided by the Lanham Act, 15 U.S.C. § 1116(d).

Copies of the Verified Complaint that will be filed in this Action, and the proposed Seizure Order, are attached hereto as Exhibits 1 and 2, respectively. You are invited to participate in this matter if you so desire.

Any questions you may have concerning this Action may be directed to attorney Loly G. Tor at the address below.

Respectfully Submitted,

/s/ Loly G. Tor  
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Dated: March 28, 2019

## EXHIBIT 1

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**UNITED STATES DISTRICT COURT  
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WORLD WRESTLING  
ENTERTAINMENT, INC.,

Plaintiff,

vs.

JOHN AND JANE DOES 1-100,  
and XYZ CORPORATIONS 1-100,

Defendants.

Civil Action No.:

**VERIFIED COMPLAINT FOR  
INJUNCTIVE RELIEF AND  
DEMAND FOR JURY TRIAL**

Plaintiff World Wrestling Entertainment, Inc. (“WWE”), by and through its undersigned attorneys, alleges the following in support of its Complaint against Defendants John and Jane Does and XYZ Corporations.

**NATURE OF THE CASE**

1. This is an action for trademark infringement, counterfeiting and dilution under the Lanham Act, 15 U.S.C. § 1051, et seq., including the Trademark Counterfeiting Act of 1984, 15 U.S.C. § 1116(d), and related state law claims for

trademark infringement, dilution and unfair competition occasioned by Defendants' unlawful manufacture, distribution and/or sale of counterfeit merchandise bearing unauthorized copies of WWE's registered and unregistered trademarks and service marks. WWE brings this action to (i) protect its reputation for selling merchandise of the highest quality and grade; (ii) prevent deception of the consuming public by Defendants; (iii) retain control over the substantial goodwill associated with the numerous registered and unregistered trademarks and service marks being unlawfully exploited by Defendants; and (iv) avoid irretrievably lost sales.

2. To achieve these goals, WWE, through an Ex Parte Motion for Temporary Restraining Order; Order for Seizure of Counterfeit Marked Goods; and Order to Show Cause Why a Preliminary Injunction Should Not Issue, seeks an order from this Court authorizing the seizure of such counterfeit merchandise.

3. Specifically, WWE seeks injunctive relief to prevent Defendants from unlawfully infringing WWE's intellectual property rights through Defendants' manufacture, distribution and/or sale of counterfeit merchandise bearing WWE's trademarks and the names or likenesses of its wrestlers during WWE's WrestleMania<sup>®</sup> 35 event and thereafter, at WWE live entertainment events during its 2019-2020 tour ("WWE's 2019-2020 Live Events"). WWE's WrestleMania<sup>®</sup> 35 events will include events taking place in the East Rutherford, New Jersey area

from April 5 through April 7, 2019, including, but not limited to, WWE's WrestleMania<sup>®</sup> 35 event at MetLife Stadium (the "WrestleMania<sup>®</sup> 35 Weekend Events").

### **PARTIES**

4. Plaintiff WWE is a Delaware corporation having its principal place of business at 1241 East Main Street, Stamford, Connecticut 06902.

5. Defendants John and Jane Does and XYZ Corporations, whose precise identities are not yet known to WWE, are individuals and entities who, upon information and belief, have done and will be doing business in the District of New Jersey, and/or are now conspiring and otherwise traveling to the District of New Jersey and other WWE 2019-2020 Live Events listed in Exhibit 3 attached hereto. This Verified Complaint will be amended to include the names of individuals and companies if and when they permit themselves to be identified.

6. Upon information and belief, Defendants are acting in concert and active participation with each other in connection with the wrongful acts alleged below.

### **JURISDICTION AND VENUE**

7. This Court has personal jurisdiction over the Defendants because they reside in and/or have transacted or will be transacting business in this State, and have caused harm or tortious injury in this State by acts within this State. Upon

information and belief, all Defendants are individuals and entities who will be present in the District of New Jersey in connection with the claims asserted below and/or who, at all times relevant hereto, have done and will be doing business in the District of New Jersey.

8. This Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. § 1338(a) and (b). This Court has supplemental jurisdiction, pursuant to 28 U.S.C. § 1367(a), with respect to the state law claims asserted herein.

9. This Court is an appropriate venue for this action under 28 U.S.C. § 1391(a)(2), because a substantial part of the events giving rise to WWE's request for relief will occur in this district.

### **FACTUAL BACKGROUND**

#### **A. WWE's Business And Marks**

10. Since at least as early as February 1983, WWE, first doing business as the "World Wrestling Federation" and now doing business as "World Wrestling Entertainment," has provided to the public live and televised wrestling-based sports entertainment events and services (the "WWE Wrestling Services"). In connection therewith, WWE has used, advertised, publicized and presented the WWE Wrestling Services, and related souvenirs, merchandise and other products ("WWE Merchandise") under its WORLD WRESTLING ENTERTAINMENT®



mark and certain other service marks and trademarks (collectively, the “WWE Marks”). A listing of those WWE Marks, both currently pending or registered with the United States Patent and Trademark Office and unregistered but exclusively owned or controlled by WWE, is set forth in Exhibits 1 and 2 hereto, respectively. Among the marks most important to this action are:

Mark	U.S. Trademark Registration Nos.
WORLD WRESTLING ENTERTAINMENT	2,818,358; 2,772,677; 2,757,599; 2,754,499; 2,870,426; 2,902,203; 2,917,910; 3,585,170; 3,585,171
WWE	2,772,683; 3,056,074; 3,541,936; 4,451,697; 3,538,710; 3,489,357; 3,412,176; 3,412,177; 3,541,956; 3,621,017
WWE Logos	4,735,547; 4,731,795; 4,735,546; 4,625,255; 4,727,923; 4,675,657; 4,538,209; 4,689,839; 4,689,835; 4,538,210; 4,614,144; 4,645,471; 4,552,144; 2,757,596; 2,754,495; 2,846,450; 2,799,228; 2,751,436; 2,757,597; 2,765,751; 2,751,437; 4,756,090; 3,412,169; 3,412,170; 3,691,588; 4,220,594; 5,291,266
WRESTLEMANIA	1,432,884; 1,863,534; 2,625,125; 2,881,508; 3,351,858; 3,351,859; 3,727,338; 3,727,339; 4,285,112; 4,780,778; 4,923,842; 5,094,698

The WWE Marks are well known to the public and have come to identify WWE to the public as the genuine source and sponsor of WWE Wrestling Services and

WWE Merchandise. WWE exclusively owns or controls all right, title and interest in the names, likenesses and rights of publicity for its current wrestlers.

11. WWE's 2019-2020 Live Events are a multi-city presentation of live wrestling entertainment events throughout the United States and in many other cities throughout the world. The itinerary of WWE's 2019-2020 Live Events is attached hereto as Exhibit 3. Most major U.S. cities will have a WWE live event appear in their city at least once or twice a year. WWE's 2019-2020 Live Events include all of the following types of programs: (1) live, pay-per-view events; (2) live, nationally-televised shows; and (3) live, non-televised events known as "house shows." In addition to generating revenues through ticket sales and promoting its pay-per-view events, WWE sells a significant portion of WWE Merchandise at its 2019-2020 Live Events.

12. WWE presents WORLD WRESTLING ENTERTAINMENT<sup>®</sup> pay-per-view events throughout the calendar year. WWE's annual marquee pay-per-view event is called "WrestleMania<sup>®</sup>" which sells for approximately \$60 per view through WWE's cable and satellite providers and is offered to subscribers of the WWE Network. WrestleMania<sup>®</sup> is considered one of the "Big Four" original annual WWE pay-per-view events, along with SummerSlam<sup>®</sup>, Royal Rumble<sup>®</sup> and Survivor Series<sup>®</sup>.

13. WWE's pay-per-view events are the biggest wrestling events of the year for WWE and offer an occasion for, inter alia, determining and crowning WWE's various champions and/or elucidating the various story lines developed by WWE throughout the year. These live pay-per-view events are extensively promoted and widely attended and viewed.

14. For example, WrestleMania<sup>®</sup> 32 occurred at AT&T Stadium in Arlington, Texas drew a crowd of 101,763 from all 50 states and 35 countries, and was viewed by 1.82 million subscribers through the WWE Network. Moreover, WrestleMania<sup>®</sup> 32 was mentioned 2.5 million times on Twitter during the day of the broadcast. WrestleMania<sup>®</sup> 33 at Camping World Stadium in Orlando, Florida drew an attendance of 75,245 and was the most-watched WrestleMania<sup>®</sup> history, reaching a record 1.95 million global households on the WWE Network alone. WrestleMania<sup>®</sup> 34 at the Mercedes-Benz Superdome in New Orleans, Louisiana drew a sold-out crowd of 78,133 spectators from all 50 states as well as 67 foreign countries.

15. WWE's WrestleMania<sup>®</sup> also has drawn record merchandise sales for the venues. For example, WrestleMania<sup>®</sup> 32 grossed \$17.3 million, making it the highest grossing live event in WWE history. WrestleMania<sup>®</sup> 32 also generated a record-breaking \$4.55 million in WrestleMania<sup>®</sup> merchandise revenue, an increase of 37 percent, or \$1.2 million, from WrestleMania<sup>®</sup> 31. WrestleMania<sup>®</sup> 33

generated \$14.5 million in revenue, breaking every Camping World Stadium record. WrestleMania<sup>®</sup> 34 grossed \$14.1 million, making it the Mercedes-Benz Superdome's highest grossing entertainment event.

16. In addition to its pay-per-view events, WWE currently presents two weekly WWE programs called "RAW<sup>®</sup>" and "Smackdown<sup>®</sup>" that feature wrestling entertainment programming every Monday and Tuesday night nationwide on the USA Network cable television channel.

17. In or around February 2014, WWE launched the WWE Network, a 24/7 direct-to-consumer online video-streaming network with scheduled programming and a massive video-on-demand library. The WWE Network is available in over 180 countries and territories and has over 1.5 million paid subscribers. The WWE Network carries all of WWE's pay-per-view events as well as original programming. WWE also provides subscribers to the WWE Network with "on demand" access to a massive and continuously growing video library of historical pay-per-view events and television programs from WWE and its predecessors as well as footage that WWE has acquired from third party wrestling promotions. Each year, more than 7,000 hours of WWE programming can be seen in 650 million homes in more than 180 countries and territories and 35 languages.

18. WWE also syndicates its video content on Hulu and YouTube including full length episodes and clips of “RAW<sup>®</sup>,” “Smackdown<sup>®</sup>” and a variety of classic content and original short-form webisodes.

19. At its Live Events, in retail stores nationwide and via on-line, WWE sells a large variety of WWE Merchandise featuring the WWE Marks. The WWE Merchandise typically displays prominently the name and logo of the company, the WWE Marks, its events, its programs, and/or the wrestlers and other personalities involved with the events and programs. Examples of WWE Merchandise include without limitation, T-shirts, jerseys, sweatshirts, caps, hats, belts, wrestling masks, sunglasses, key rings, action figures, posters, and DVDs.

**B. Counterfeiting At Previous Live Events**

20. For many years, WWE has sold WWE Merchandise at and in connection with its live events. WWE’s venue merchandise business consists of the design, sourcing, marketing and distribution of numerous WWE-branded products, such as t-shirts, caps and other novelty items, all of which feature WWE’s trademarks, Superstars, Divas and/or logos, including WORLD WRESTLING ENTERTAINMENT<sup>®</sup>, WWE<sup>®</sup>, the WWE<sup>®</sup> logo, and/or one or a number of other WWE Marks included in Exhibits 1 and 2 hereto. In 2018, venue merchandise net revenues were approximately \$22 million.

21. WWE Merchandise is of the highest quality and grade. These genuine goods are currently being sold only at authorized locations throughout the United States including, but not limited to, WWE live event venues and retail stores in the District of New Jersey, as well as authorized online retail stores such as WWE's e-commerce website at [www.shop.wwe.com](http://www.shop.wwe.com).

22. Based upon information and belief, WWE's past experiences and its investigation into this matter, WWE asserts that Defendants, alone and in conjunction with other, similarly situated individuals and entities, specifically numerous peddlers and manufacturing and distribution entities, will be attempting to sell or distribute counterfeit goods at or near WWE's 2019-2020 Live Events that are of inferior quality to those goods WWE sells and licenses for sale. These goods, which are marked with imitations or counterfeits of the WWE Marks, include, inter alia, T-shirts, sweatshirts, caps, wrestling masks, DVDs, posters, and other souvenirs, merchandise and memorabilia ("Counterfeit Merchandise"). In addition, the merchandise sold by Defendants not only is counterfeit but the merchandise also threatens public safety. Based on past experience, there are concerns about the quality of the counterfeit goods, such as the flammability level of the ink used to print the t-shirts, and the safety of the design of other goods, including wrestling face masks.

23. For example, at WWE's WrestleMania<sup>®</sup> 27 events, held on March 30 through April 4, 2011, in Atlanta, Georgia, WWE encountered an untold number of individuals, who came from all over the United States, distributing and selling Counterfeit Merchandise. With the aid of an ex parte TRO and seizure order granted by the United States District Court for the Northern District of Georgia, WWE was able to gain some measure of control over such counterfeiting by seizing more than 3,000 counterfeit t-shirts during the WrestleMania<sup>®</sup> 27 weekend events. The t-shirts were being sold for at least \$10 per shirt.

24. At the WrestleMania<sup>®</sup> 28 events in Miami, Florida in 2012, WWE again encountered numerous counterfeiters from various states selling bootleg merchandise. In the course of enforcing an ex parte TRO and seizure order issued by the United States District Court for the Southern District of Florida, WWE seized hundreds of counterfeit shirts. Most of those shirts were child-sized and emitted a strong unknown chemical odor, which further increases and heightens the public safety concern.

25. Evidencing and confirming the coordinated nature of Defendants' illegal activities, two of the counterfeiters who were served in Miami, Florida in 2012 had previously been served at WrestleMania<sup>®</sup> 24 in Orlando, Florida in 2008 pursuant to an ex parte TRO and seizure order. In addition, as described in more detail below, two of the defendants who were served in **Miami, Florida in 2012**

were served again in **New Orleans, Louisiana in 2014.** These facts establish Defendants complete disregard for the law and their intent to follow WWE Live Events around the United States.

26. In 2013, WWE's WrestleMania<sup>®</sup> 29 was held in this District in East Rutherford, New Jersey. WWE again encountered numerous counterfeiters from various states selling bootleg merchandise. In the course of enforcing an ex parte TRO and seizure order issued by this Court, WWE seized thousands of counterfeit T-shirts, DVDs, action figures and posterboards. WWE also obtained a consented to permanent injunction against one of the counterfeiters that WWE served in connection with the court's TRO and seizure order.

27. In 2014, WWE's WrestleMania<sup>®</sup> 30 events were held in New Orleans, Louisiana. Initially, the United States District Court for the Eastern District of Louisiana denied WWE's request for an ex parte TRO and seizure order on the ground that WWE had not pleaded sufficient specific facts about the unknown counterfeiters' identities. WWE appealed that order and the Court of Appeals for the Fifth Circuit vacated the decision and held that WWE, based upon similar allegations to those alleged here, had established its entitlement to a TRO and Seizure Order.

28. Without the benefit of a TRO and seizure order, WWE's ability to combat counterfeit sales was significantly hampered. However, WWE was able to



identify the putative names of four individuals who were caught selling counterfeit merchandise. WWE was not able to obtain contact information for all four individuals, and the contact information it did obtain turned out to be false.

29. WWE filed two amended Motions for TRO and Seizure Order against the four identified individuals, which the United States District Court for the Eastern District of Louisiana granted. As alleged above, two of the identified individuals had been previously served in Miami in 2012 pursuant to an ex parte TRO and seizure order granted by the Southern District of Florida in connection with WrestleMania<sup>®</sup> 28. The individuals did not participate in the Southern District of Florida proceeding and likewise failed to return process or enter an appearance in the Eastern District of Louisiana's proceeding.

30. In 2015, WWE obtained and enforced an ex parte TRO and seizure order issued by the United States District Court for the Northern District of California at the WrestleMania<sup>®</sup> 31 events in San Jose and Santa Clara, California. In connection with the Northern District of California's order, WWE served several counterfeiters and seized their counterfeit merchandise. After the WrestleMania<sup>®</sup> 31 events, WWE entered into a settlement agreement that permanently enjoined three of the named counterfeiters.

31. In 2016, the United States District Court for the Northern District of Texas issued WWE an ex parte TRO and seizure order for WWE's WrestleMania<sup>®</sup>

32 events in Dallas and Arlington, Texas. With the assistance of local law enforcement, WWE was able to obtain the names of several counterfeiters and obtained a permanent injunction against two of the counterfeiters that WWE served in connection with the court's TRO and seizure order.

32. In 2017, the United States District Court for the Middle District of Florida issued WWE an ex parte TRO and seizure order for WWE's WrestleMania<sup>®</sup> 33 events in Orlando, Florida. Pursuant to the court's order, WWE seized hundreds of counterfeit items and served four individuals, including one individual who had traveled nearly 500 miles from Canton, Georgia.

33. In 2018, the United States District Court for the Eastern District of Louisiana issued WWE an ex parte TRO and seizure order for WWE's WrestleMania<sup>®</sup> 34 events in New Orleans, Louisiana. However, due to the large police presence, WWE did not serve any bootleggers. Thereafter, WWE dismissed the case without prejudice and without moving for any additional relief from the court.

34. Since WWE's WrestleMania<sup>®</sup> 34 events, WWE has continued to encounter counterfeiters at its Live Events. For instance, on July 8, 2018, WWE encountered numerous counterfeiters at the WWE RAW<sup>®</sup> event held in Bridgeport, CT at the Webster Bank Arena. These counterfeiters were selling "WWE<sup>®</sup> Live SummerSlam Heatwave Tour 2018" shirts that displayed counterfeit WWE Marks

on the front and a list of WWE event locations on the back. A few weeks later, the identical counterfeit merchandise was being sold at a WWE live event held in Brooklyn, NY at the Barclays Center.

35. Similarly, on January 8, 2019, WWE encountered counterfeit merchandise at its WWE Smackdown<sup>®</sup> Live event held in Jacksonville, FL at Jacksonville Veterans Memorial Arena. The counterfeit merchandise consisted of “WWE<sup>®</sup> Live” shirts that displayed counterfeit WWE Marks and Superstars on the front and a list of WWE<sup>®</sup> Live events on the back. A week later, WWE encountered similar counterfeit merchandise its WWE<sup>®</sup> Live event held in Louisiana, Kentucky at the Rupp Arena. The counterfeit merchandise in Kentucky was similar to that found in Florida in that the merchandise displayed “WWE<sup>®</sup> Live” with counterfeit WWE Marks and Superstars on the front and a list of WWE<sup>®</sup> Live events on the back, including listing the WrestleMania<sup>®</sup> 35 event in East Rutherford, New Jersey. In addition, the individuals who were selling the counterfeit merchandise in Kentucky also were selling WWE counterfeit merchandise in West Virginia three days earlier. Based on these experiences and WWE’s prior experience, WWE believes and asserts that Defendants have and will continue to sell this Counterfeit Merchandise and others like it in this District and across the United States.

36. At no time has WWE authorized Defendants to manufacture, distribute, offer for sale or sell any Counterfeit Merchandise, nor any WWE Merchandise or goods or materials bearing the WWE Marks not specifically licensed and approved by WWE.

37. Based upon its investigation into the matter, and as described more fully in the Declaration of Lauren Dienes-Middlen, Esq., WWE has observed that the design, materials and quality of most of the Counterfeit Merchandise being distributed and sold at WWE live events throughout the United States is poor and uniform from event to event and city to city. As set forth above, WWE has encountered Counterfeit Merchandise that lists multiple WWE live events making it easy for such merchandise to be sold from venue to venue. Based in part on this uniformity, WWE believes and avers that Defendants distributing and selling Counterfeit Merchandise are part of a concerted operation that travels and works together from venue to venue to sell unauthorized Counterfeit Merchandise likely acquired from common sources of manufacture. Many of the individual Defendants sell the same Counterfeit Merchandise in different cities. Groups of these individuals travel together from event to event, including in the District of New Jersey.

38. Thus, without the aid of a federal court order authorizing seizure of Counterfeit Merchandise, WWE is unable to combat the network of individuals

and entities distributing and selling unauthorized Counterfeit Merchandise at WWE's WrestleMania<sup>®</sup> 35 event and its 2019-2020 Live Events and is effectively rendered unable to protect its rights, and the rights of the consuming public, against the unauthorized and unlawful distribution and sale of Counterfeit Merchandise at WWE's WrestleMania<sup>®</sup> 35 events and other 2019-2020 Live Events.

39. As demonstrated by the Dienes-Middlen Declaration, throughout the past several years of WWE live events, WWE has encountered numerous sellers of Counterfeit Merchandise at various locations throughout the United States.

40. During the course of WWE's enforcement of TROs, Seizure Orders and preliminary injunctions entered by this Court and others (*see* ¶¶ 21-31), WWE has been able to eliminate thousands of counterfeit T-shirts, caps, wrestling masks, posters, DVDs, pictures and other items of Counterfeit Merchandise marked with imitations of the WWE Marks and sold to WWE's loyal fans. As a result of WWE's ability to seize Counterfeit Merchandise, WWE was able to avoid some lost sales and, more importantly, lessen the irreparable injury to WWE's reputation and goodwill with the consuming public that is caused by Defendants' illegal conduct. In addition, as a result of WWE's ability to seize Counterfeit Merchandise, WWE was able to protect the safety of the public, including children, against potential harmful effects of such uncontrolled, inferior and potentially dangerous goods.

41. Pursuant to past TROs, Seizure Orders and preliminary injunctions, WWE has posted a bond and proceeded at all times with the utmost caution in seizing only those goods that WWE's enforcement team determined to be Counterfeit Merchandise. WWE has enforced the TROs, Seizure Orders and preliminary injunctions in a manner designed to protect its trademarks and service marks without compromising any rights Defendants may have.

42. Many of the individuals served under these prior TROs, Seizure Orders and preliminary injunctions refused to identify themselves, refused to accept service, or both. In addition, with respect to those that do not accept service, many of them provide fake identification. Moreover, none of the Defendants in those actions came forward with objections to the court. Such behavior is typical of counterfeiters who distribute and sell unauthorized merchandise at live entertainment events.

43. The TROs, Seizure Orders and preliminary injunctions issued in the past enabled WWE to effectively police distribution and sale of Counterfeit Merchandise throughout WWE's live events. Defendants' conduct, however, represents a continuing problem, not yet abated, and the only effective relief available to WWE is the ex parte seizure process.

44. Without the ability to seize Counterfeit Merchandise at and near the WrestleMania<sup>®</sup> 35 Weekend Events in the East Rutherford, New Jersey area from

April 5 through April 7, 2019 and thereafter at WWE's 2019-2020 Live Event venues, WWE stands (i) to lose merchandise sales; (ii) to suffer incalculable, irreparable damage to its reputation and goodwill; and (iii) to lose the ability to protect the safety of WWE's fans -- who specifically decide to buy tickets and attend WWE's live events -- against potential harmful effects of the inferior and potentially dangerous Counterfeit Merchandise sold right outside WWE's live events.

**C. Expected Counterfeiting at WrestleMania<sup>®</sup> 35 Weekend Events in the East Rutherford Area and Elsewhere**

45. WWE's WrestleMania<sup>®</sup> 35 Weekend Events are scheduled for April 5, 2019 through April 7, 2019.<sup>1</sup> The events include, but are not limited to, WWE's WrestleMania<sup>®</sup> 35 event at MetLife Stadium. WWE's 2019-2020 Live Events will proceed throughout the United States according to the schedule attached hereto as Exhibit 3.

46. WWE has heavily advertised and promoted its WrestleMania<sup>®</sup> 35 Weekend Events and remaining 2019-2020 Live Events, and will continue to advertise and promote heavily these events using the WWE Marks.

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<sup>1</sup> WWE will be hosting additional WrestleMania<sup>®</sup> 35 weekend events in New York, including WWE's NXT Blacklist, WWE's NXT Takeover New York, WWE's Hall of Fame Brooklyn, WWE's RAW Brooklyn, and WWE's Smackdown Brooklyn. However, WWE's request for a TRO is limited to events that will take place in this District including WrestleMania<sup>®</sup> 35 at MetLife Stadium in East Rutherford, New Jersey.

47. As demonstrated herein, the only effective means of protecting WWE's trademarks and service marks from unlawful counterfeiting by Defendants at WWE's 2019-2020 Live Events is through the ex parte seizure process, which provides WWE with the ability to fight against unlawful counterfeiting. To maintain any meaningful defense against the unlawful distribution and sale by Defendants of Counterfeit Merchandise at WWE's 2019-2020 Live Events, which is an ongoing problem inherent in the live entertainment industry, WWE must be allowed to proceed with the ex parte seizure process.

48. Indeed, Defendants are habitual "repeat offenders" who refuse to identify themselves or accept service, much less appear in court in connection with the seizure of their unlawful goods. Aware of the illegality of their activities, these individuals and groups, if caught, will quickly hide or dispose of their Counterfeit Merchandise, or load it into a waiting vehicle and lock the vehicle or drive it away. Most sellers have only a small number of items at any given time and their supply is replenished after being seized by WWE. In fact, WWE has encountered this exact modus operandi consistently over the years. Thus, Defendants are organized and acting in concert with one another and are making a conscious effort to hide their identities.

49. Defendants are without offices, identification, licenses or addresses. In this manner, they can avoid having to respond to an ordinary civil lawsuit and



thus are essentially immune from an injunction unless it is accompanied by authority to seize Counterfeit Merchandise.

50. For example, through the enforcement of ex parte TROs, Seizure Orders and preliminary injunctions, WWE has attempted to serve hundreds of counterfeiters and has seized thousands of items of Counterfeit Merchandise. Most of the apprehended counterfeiters, who not only appear at the venues where the event is occurring but also in the parking areas at the venues and on the roads that led to the venues, refused to identify themselves and refused to accept service, and none of them came forward to respond formally in court. WWE would welcome their appearances in court, as it would permit WWE to identify the bootleggers, take discovery from them, discover their manufacturing and printing sources and pursue them for money damages.

51. Defendant bootleggers will continue, undaunted, to attempt to peddle Counterfeit Merchandise at WWE's 2019-2020 Live Events, and WWE's only means of keeping their conduct under control is through the ex parte seizure process.

52. Based upon the foregoing, and based upon its experience enforcing earlier TROs, Seizure Orders and preliminary injunctions as explained in the Dienes-Middlen Declaration, WWE believes and therefore avers that Defendants will follow WWE's 2019-2020 Live Events from city to city, throughout the

country, selling Counterfeit Merchandise. Defendants constitute bootlegging rings that operate in this District by obtaining Counterfeit Merchandise from a small number of manufacturers.

53. On information and belief, Defendants will be selling Counterfeit Merchandise at the WrestleMania<sup>®</sup> 35 Weekend Events and will continue to attempt to sell Counterfeit WWE Merchandise at WWE's 2019-2020 Live Events.

54. Ex parte seizure relief is thus essential if WWE is to maintain a defense against and effectively police the unlawful activities of Defendants at the WWE 2019-2020 Live Events, including at the WrestleMania<sup>®</sup> 35 Weekend Events in the East Rutherford, New Jersey area. Without such relief, WWE will have no effective remedy against Defendants' continued distribution and sale of Counterfeit Merchandise that infringes WWE's registered and unregistered trademarks and service marks, threatens lost sales in untold dollars, deceives the consuming public into mistakenly believing they are purchasing authorized, licensed, high quality goods, and poses a potential safety risk because of the inability for WWE to control the quality of the materials used by the bootleggers.

**D. Irreparable Harm to WWE**

55. Defendants' use of counterfeits of the WWE Marks on the Counterfeit Merchandise will deceive the consuming public into believing that they are purchasing genuine goods which have been manufactured, authorized, or approved

by WWE, and will likely cause confusion and mistake in that consumers are likely to assume that WWE has manufactured, authorized, or approved the Counterfeit Merchandise sold by Defendants.

56. In addition to causing WWE to suffer incalculable, irrecoverable and irreparable lost sales, Defendants' manufacture, distribution and sale of inferior quality Counterfeit Merchandise displaying the WWE Marks will irreparably injure WWE's reputation for the manufacture and sale of the highest quality souvenirs, merchandise, and memorabilia and poses a potential safety risk to the public because WWE is unable to control the quality of the materials used by the bootleggers. Indeed, there is no way to know the quality of the counterfeit goods, such as the flammability level of the ink used to print the t-shirts and the safety of the design of other goods, such as wrestling masks, that previously have been seized. For example, much of the counterfeit merchandise seized at prior WrestleMania<sup>®</sup> events consisted of child-sized t-shirts and emitted a strong unknown chemical odor, which further increases and heightens the public safety concern.

57. Based on WWE's prior encounters with sellers of Counterfeit Merchandise at live events, other WWE events, and in the retail and wholesale distribution context, on information and belief, WWE alleges that, if Defendants are notified that WWE has filed this lawsuit and has filed a Motion for TRO,

Defendants will cause the unauthorized Counterfeit Merchandise to be dispersed and, thereafter, sold at other locations on or near the premises of the event arenas or elsewhere with the result that WWE will be unable to obtain an effective remedy for Defendants' wrongful conduct.

**COUNT I**  
**Trademark Infringement (Registered Marks)**

58. Plaintiff hereby re-alleges, as if fully set forth herein, paragraphs 1 through 57 of this Complaint.

59. The WWE Marks on WWE Merchandise have become well and favorably known to consumers throughout the United States, including New Jersey, as an indication of goods emanating from or authorized by a single source, i.e., WWE.

60. Defendants' use of counterfeits of the WWE Marks on the Counterfeit Merchandise constitutes infringement of WWE's registered trademarks in violation of § 32 of the Lanham Act, 15 U.S.C. § 1114.

61. The threat of the loss of WWE's right to control the use of its marks and the reputation of its goods is real and substantial. This loss is further enhanced by the inferior quality of Defendants' Counterfeit Merchandise.

62. Defendants' acts described herein will infringe the WWE Marks, will injure WWE's business, reputation, and goodwill, and unless restrained and

enjoined will continue to do so, all to WWE's monetary damage and irreparable harm.

**COUNT II**  
**Trademark Infringement (Unregistered Marks) And False Designation Of Origin**

63. Plaintiff hereby re-alleges, as if fully set forth herein, paragraphs 1 through 57 of this Complaint.

64. Defendants' use of the WWE Marks on the Counterfeit Merchandise constitutes infringement of WWE's unregistered trademarks in violation of § 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

65. Defendants' use of the WWE Marks on the Counterfeit Merchandise creates a false designation of origin and a false representation of Defendants' goods, all in violation of § 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

66. The threat of the loss of WWE's right to control the use of its marks and the reputation of its goods is real and substantial. This loss is further enhanced by the inferior quality of Defendants' Counterfeit Merchandise.

67. Defendants' acts described herein will infringe the WWE Marks, will injure WWE's business, reputation, and goodwill, and unless restrained and enjoined, will continue to do so, all to WWE's monetary damage and irreparable harm.

**COUNT III**  
**Federal Trademark Dilution**

68. Plaintiff hereby re-alleges, as if fully set forth herein, paragraphs 1 through 57 of this Complaint.

69. As a result of the duration and extent of WWE's use and promotion of the WWE Marks, at least WWE<sup>®</sup>, WWE<sup>®</sup> logo, Raw<sup>®</sup>, Smackdown<sup>®</sup>, WrestleMania<sup>®</sup>, SummerSlam<sup>®</sup>, Royal Rumble<sup>®</sup>, Survivor Series<sup>®</sup> and names and likenesses of several of its current wrestlers are famous and highly distinctive.

70. Defendants are making commercial use of these WWE marks in interstate commerce.

71. Defendants' use began long after these WWE marks became famous.

72. Defendants' use of these WWE marks dilutes the distinctive quality of the marks by diminishing the capacity of the marks to identify and distinguish WWE's goods and services, in violation of § 43(c) of the Lanham Act, 15 U.S.C. § 1125(c).

73. Defendants willfully intended to trade on WWE's reputation and goodwill, and to cause dilution of WWE's famous marks.

74. Defendants' conduct has caused and continues to cause WWE immediate and irreparable injury. WWE lacks an adequate remedy at law.

**COUNT IV**  
**Trafficking In Counterfeit Goods**

75. Plaintiff hereby re-alleges, as if fully set forth herein, paragraphs 1 through 57 of this Complaint.

76. Defendants' souvenirs, merchandise, and memorabilia constitute goods bearing counterfeit marks. Defendants have trafficked these goods in violation of the Trademark Counterfeiting Act of 1984, 15 U.S.C. § 1116(d) and unless restrained and enjoined, will continue to traffic these goods, all to WWE's monetary damage and irreparable harm.

**COUNT V**  
**Trademark Infringement and**  
**Unfair Competition, Under New Jersey Law**

77. Plaintiff hereby re-alleges, as if fully set forth herein, paragraphs 1 through 57 of this Complaint.

78. The WWE Marks are marks valid at common law.

79. Defendants' unauthorized use of the WWE Marks is likely to cause confusion, or mistake or to deceive as to the source of Defendants' goods and services, which constitutes trademark infringement and dilution under the common law of New Jersey.

80. Defendants' unauthorized use of the WWE Marks constitutes trademark infringement, trademark dilution and unfair competition under New

Jersey common law and the New Jersey unfair competition statute, N.J. Stat. Ann. § 56:4-1.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff World Wrestling Entertainment, Inc. respectfully prays:

1. That this Court grant a temporary restraining order and a preliminary and permanent injunction enjoining Defendants and each of his, her, or their partners, associates, agents, servants, and employees, and all other bootleggers acting in concert therewith or having knowledge thereof, from manufacturing, distributing, offering for sale or selling Counterfeit Merchandise.

2. That this Court order that all Counterfeit Merchandise and any records documenting the manufacture, sale, or distribution of Counterfeit Merchandise, found in the possession, custody, or control of Defendants be seized until a hearing can be held before this Court to determine the disposition of any goods so seized.

3. That Defendants be required to account to and reimburse WWE for any and all profits which Defendants have derived from the sale of any Counterfeit Merchandise and for any and all damages which WWE has sustained by reason of the acts complained of herein, or statutory damages.

4. That Defendants be required to pay treble the amount of any profits derived from the sale of any Counterfeit Merchandise.



5. That this Court award WWE its cost and reasonable attorneys' fees in this action.

6. That this Court grant such other and further relief as it deems just and appropriate under the circumstances.

**DEMAND FOR JURY TRIAL**

Plaintiff World Wrestling Entertainment, Inc. hereby demands a trial by jury of all issues so triable.

Respectfully Submitted,

/s/ Loly G. Tor  
Loly G. Tor  
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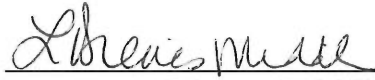
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*Attorneys for World Wrestling Entertainment, Inc.*

Dated: March 28, 2019

**VERIFICATION**

I am Senior Vice President, Assistant General Counsel - Intellectual Property, Business and Legal Affairs of Plaintiff World Wrestling Entertainment, Inc. The allegations in the foregoing Complaint that relate or refer to World Wrestling Entertainment, Inc. are true to my own knowledge and as to those allegations that relate or refer to Defendants' activities and that are alleged upon information and belief, I believe them to be true. I verify under penalty of perjury that the foregoing is true and correct.

Executed this 27<sup>th</sup> day of March, 2019 in Stamford, Connecticut.

A handwritten signature in black ink, appearing to read "Lauren A. Dienes-Middlen", written over a horizontal line.

Lauren A. Dienes-Middlen  
Senior Vice President, Assistant General Counsel  
Intellectual Property, Business and Legal Affairs  
World Wrestling Entertainment, Inc.

### **LOCAL RULE 11.2 CERTIFICATION**





















I certify that the matter in controversy in this action currently is not known to me to be the subject of any other action pending in any Court or of any pending arbitration or administrative proceeding. The matter in controversy in this action was previously before the United States District Court for the District of New Jersey in the action styled World Wrestling Entertainment, Inc. v. John Does 1-100, Case No. 13-01918-SRC-CLW.

Dated: March 28, 2019

s/ Loly G. Tor  
Loly G. Tor

# **EXHIBIT 1**

**WWE TRADEMARKS PENDING/REGISTERED WITH  
THE UNITED STATES PATENT AND TRADEMARK OFFICE ("U.S. PTO")**

<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
	4,735,547; 4,731,795; 4,735,546; 4,625,255; 4,727,923; 4,675,657; 4,538,209; 4,689,839; 4,689,835; 4,538,210; 4,614,144; 4,645,471; 4,552,144; 5,291,266	<b>WRESTLEMANIA</b>	1,432,884; 1,863,534; 2,625,125; 2,881,508; 3,351,858; 3,351,859; 3,727,338; 3,727,339; 4,285,112; 4,923,842
 (Color Version)	4,645,471		4,285,112
<b>WWE</b>	2,772,683; 3,056,074; 3,541,936; 4,451,697; 3,538,710; 3,489,357; 3,412,176; 3,412,177; 3,541,956; 3,621,017		3,960,447
<b>WORLD WRESTLING ENTERTAINMENT</b>	2,818,358; 2,772,677; 2,757,599; 2,754,499; 2,870,426; 2,902,203; 2,917,910; 3,585,170; 3,585,171		3,042,792; 3,115,074; 3,473,626
 (Color Version)	3,691,5884,220,594		2,757,596; 2,754,495; 2,846,450; 2,799,228; 2,751,436; 2,757,597; 2,765,751; 2,751,437; 4,756,090; 3,412,169; 3,412,170
	4,687,331		4,032,288; 4,006,983
	4,871,102		2,968,039
	5,182,283; 5,177,091		1,574,169; 1,348,618
	86/900,547; 86/900,534; 86/900,716		4,123,178
	88297004		
	3,627,500; 3,755,039		4,865,510
	4,593,423; 85/708,147		86/341,786; 86/348,537; 86/348,567; 86/348,577

<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
	86/341,769; 86/341,802; 86/341,811; 86/348,587		4,614,144
	3,720,155; 86/501,868; 86/501,883		4,552,144
	4,031,024		3,894,082
	5,586,551; 86/704,311; 86/704,296; 86/704,322; 86/704,159		87/381,426
	88104920		
<b>619</b>	4,675,811	<b>LEAGUE OF NATIONS</b>	86/835,228; 86/835,579
<b>ADAM ROSE</b>	86/425,743	<b>LEGEND KILLER</b>	3,759,319; 3,276,609
<b>ALBERTO DEL RIO</b>	4,328,835; 4,332,424	<b>LEGENDARY</b>	4,436,755
<b>ALEX RILEY</b>	4,594,271	<b>LEGION OF DOOM</b>	87062660
<b>ALEXA BLISS</b>	87134875	<b>LEPRECHAUN: ORIGINS</b>	85/584,680
<b>ALICIA FOX</b>	86/090,782	<b>LITA</b>	86/716,546
<b>A-LIST</b>	4,049,974	<b>LUKE GALLOWS</b>	87014049
<b>AMERICAN ALPHA</b>	86/855,122	<b>LUKE HARPER</b>	86/924,992
<b>AMERICAN WRESTLING ASSOCIATION</b>	1,410,887	<b>LUNATIC FRINGE</b>	86/370,180; 86/370,187; 86/370,179
<b>ANTONIO CESARO</b>	86/269,574	<b>MANIA</b>	86/557,373
<b>APOLLO NATION</b>	86/721,632	<b>MANKIND</b>	3,848,186
<b>ARMAGEDDON</b>	2,807,405; 2,801,333	<b>MARIA</b>	3,752,689
<b>ASUKA</b>	86/753,293	<b>MARK HENRY</b>	3,752,693
<b>A-TRAIN</b>	3,419,749	<b>MARYSE</b>	87061776

<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
<b>AUSTIN 3:16</b>	2,313,120; 2,299,461; 2,299,462	<b>MEXAMERICAN</b>	86/798,849
<b>AWA</b>	1,401,633; 4,863,983; 86/306,286; 86/380,916; 86/943,682; 87/815,817	<b>MEXICOOLS</b>	3,252,431
<b>BACKLASH</b>	2,642,926; 2,627,703; 2,771,710	<b>MICHAEL MCGILLICUTTY</b>	4,096,087
<b>BAD BLOOD</b>	3,174,728; 3,199,302	<b>MICHAEL TARVER</b>	3,934,005
<b>BALOR CLUB</b>	86/583,739	<b>MIKE KNOX</b>	3,469,661
<b>BAM NEELY</b>	3,720,981	<b>MNM</b>	3,450,870; 78/606,874
<b>BATISTA</b>	3,084,462; 3,119,128; 3,084,463; 3,404,371	<b>MOJO RAWLEY</b>	87134923
<b>BE A STAR</b>	4,760,595; 86/899,213	<b>MONEY IN THE BANK</b>	3,532,434; 3,949,008; 3,949,010; 3,949,009; 4,358,310; 3,945,864
<b>BECKY LYNCH</b>	86/925,632	<b>MONTEL VONTAVIOUS PORTER</b>	3,731,900
<b>BE LIKE NO ONE</b>	87/365,362; 87/365,023; 87/364,997; 87/364,994	<b>MR. MCMAHON</b>	3,048,616; 3,419,750
<b>BELLA TWINS</b>	4,809,017	<b>MR. PERFECT</b>	2,003,188
<b>BENDING THE RULES</b>	4,388,467	<b>MVP</b>	3,525,024
<b>BETH PHOENIX</b>	3,801,534	<b>NAOMI</b>	86/429,964
<b>BEYOND THE RING</b>	4,822,923; 86/170,564	<b>NATALYA</b>	86/086,127
<b>BIG BOSS MAN</b>	3,469,974	<b>NATURE BOY</b>	3,941,046
<b>BIG E LANGSTON</b>	4,841,827	<b>NEVER GIVE UP</b>	4,777,712
<b>BIG RED</b>	86/466,331	<b>NEVER GIVE UP BY JOHN CENA</b>	85/927,376
<b>BIG SHOW</b>	2,696,880; 3,069,207; 3,218,574; 4,014,404; 86/822,412	<b>NEVILLE</b>	86/683,943
<b>BLAST AREA</b>	2,659,716	<b>NEW YEARS REVOLUTION</b>	3,298,836
<b>BOBBY ROODE</b>	87214988	<b>NIA JAX</b>	87134863
<b>BO DALLAS</b>	86/425,734	<b>NIGHT OF CHAMPIONS</b>	3,589,378; 3,747,410; 3,925,939; 3,747,411
<b>BODY DONNAS</b>	2,220,008	<b>NIKKI BELLA</b>	86/429,958
<b>BOOKER T</b>	3,234,256; 3,230,536; 3,142,989	<b>NOAM DAR</b>	87214298
<b>BOOTS TO ASSES</b>	4,838,528	<b>NO MERCY</b>	2,757,508; 2,803,552; 4,616,254
<b>BOOTY O</b>	86/939,876; 86/939,871	<b>NO WAY JOSE</b>	86/868,289
<b>BRAD MADDOX</b>	86/429,985	<b>NO WAY OUT</b>	2,453,023; 2,625,121; 4,388,956



<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
<b>BRADSHAW</b>	2,939,820	<b>NVRGVUP</b>	2,341,582; 3,176,335
<b>BRAUN STROWMAN</b>	86/925,015	<b>NWO</b>	2,120,098; 2,120,099
<b>BRAY WYATT</b>	86/665,296	<b>NWO NEW WORLD ORDER</b>	2,972,641; 2,993,019; 4,875,586
<b>BREAKING GROUND</b>	86/733,794	<b>NXT</b>	3,854,998; 77/918,577; 86/220,806; 86/220,794; 86/220,779
<b>BRIAN KENDRICK</b>	87219196	<b>NXT ROOKIE</b>	3,945,854
<b>BRIE BELLA</b>	86/429,950	<b>NXT TAKEOVER</b>	86/261,560; 86/806,888
<b>BRING IT TO THE TABLE</b>	87295086	<b>NXT: ARRIVAL</b>	86/189,367; 86/189,609; 86/189,267
<b>BROCK LESNAR</b>	86/925,032	<b>ONE NIGHT STAND</b>	3,785,401; 3,785,402
<b>BRODUS CLAY</b>	4,712,804	<b>OVER THE LIMIT</b>	3,949,006; 3,949,007; 4,361,681; 3,945,862
<b>BUBBA RAY DUDLEY</b>	3,620,864	<b>PAIGE</b>	86/422,215
<b>CAMP WWE</b>	86/579,889	<b>PAUL BURCHILL</b>	3,720,960
<b>CARLITO</b>	3,971,009; 3,848,416; 3,898,466	<b>PIT BULLS</b>	3,902,166
<b>CARMELLA</b>	87214280	<b>PRIMO COLON</b>	3,936,563
<b>CEDRIC ALEXANDER</b>	87214286	<b>RANDY ORTON</b>	2,957,044; 3,059,530; 3,059,531; 3,059,535
<b>CELTIC WARRIOR</b>	4,863,926; 86/557,265	<b>RANJIN SINGH</b>	3,720,962
<b>CENA</b>	86/664,519	<b>RAW</b>	2,396,746; 2,086,903; 4,125,983; 4,804,352; 86/610,604; 87/562,709
<b>CENATION</b>	4,522,307; 4,471,264; 86/383,836; 86/886,605	<b>RAW ACTIVE</b>	85/626,795
<b>CHARLOTTE</b>	86/925,738	<b>RAW TALK</b>	87220699
<b>CHERRY</b>	3,632,051	<b>REDNECK RECKIN' COMPANY</b>	86/533,507
<b>CHRIS JERICHO</b>	2,384,740; 3,924,748; 3,130,651	<b>REY MYSTERIO</b>	2,972,939; 3,124,385; 3,209,567
<b>CHRIS MASTERS</b>	3,240,451	<b>RICH SWANN</b>	87214303
<b>CHRISTIAN</b>	4,017,648; 4,358,308; 3,648,789	<b>RIC FLAIR</b>	4,658,715; 86/824,697; 86/824,704
<b>CLASH OF CHAMPIONS</b>	87067543; 87067524; 87067514	<b>RIKISHI</b>	2,807,414
<b>CLEAR WATER PICTURES</b>	86/790,672; 86/790,703; 86/790,686	<b>RIP 'EM</b>	4,580,634
<b>CO-BRO</b>	4,675,801	<b>RISE ABOVE CANCER</b>	86/742,929; 86/742,923
<b>CODY RHODES</b>	3,696,328	<b>RISE ABOVE HATE</b>	86/825,619
<b>COLIN CASSADY</b>	87/014,026	<b>ROB VAN DAM</b>	3,276,175

<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
<b>CONNOR'S CURE</b>	86/903,969	<b>ROBBIE MCALLISTER</b>	3,767,980
<b>CRUISERWEIGHT CLASSIC</b>	5,084,008; 87/064,203	<b>ROCKPOCALYPSE</b>	4,760,711
<b>CRUSH CLOTHING</b>	85/927,474; 85/927,428	<b>ROMAN REIGNS</b>	4,614,890; 86/819,169; 86/819,175
<b>CRUSH COUTURE</b>	85/909,787	<b>ROSA MENDES</b>	86/087,216
<b>CRUSH GEAR</b>	85/921,244; 85/921,211	<b>ROYAL RUMBLE</b>	4,002,779; 3,845,745; 1,972,560; 1,930,440; 2,681,135; 2,618,355
<b>CRUSH WEAR</b>	85/921,201	<b>R-TRUTH</b>	3,720,963
<b>CRYME TYME</b>	86/724,841	<b>RUSEV</b>	4,915,478
<b>CURT AXEL</b>	4,534,733	<b>RYBACK</b>	4,262,738
<b>CURT HAWKINS</b>	4,047,340	<b>SAMI ZAYN</b>	86/626,272
<b>CURTIS AXEL</b>	4,841,829	<b>SANTINO MARELLA</b>	3,676,967
<b>CYBER SUNDAY</b>	3,478,412	<b>SASHA BANKS</b>	86/925,636
<b>DAMIEN SANDOW</b>	4,809,116	<b>SATURDAY NIGHT'S MAIN EVENT</b>	3,832,577
<b>DANA BROOKE</b>	87/073,846	<b>SAWFT</b>	87/238,570
<b>DANIEL BRYAN</b>	3,933,993; 4,846,724	<b>SCOTTY 2 HOTTY</b>	3,107,710
<b>DARREN YOUNG</b>	3,933,997	<b>SETH ROLLINS</b>	4,841,810; 86/763,866; 86/808,287
<b>DAVID HART SMITH</b>	3,994,401	<b>SHANE MCMAHON</b>	3,130,690
<b>DAVID OTUNGA</b>	3,930,734	<b>SHAWN MICHAELS</b>	3,130,643; 3,412,626; 3,230,534
<b>DEAN AMBROSE</b>	4,470,627	<b>SHEAMUS</b>	3,892,393; 86/886,576
<b>DECEMBER TO DISMEMBER</b>	3,402,365	<b>SHELL SHOCKED</b>	86/864,380
<b>DELICIOUS</b>	3,871,264	<b>SHELTON BENJAMIN</b>	3,127,655
<b>DEMON KING</b>	87138656; 87138642; 87138638	<b>SHOWTIME PERCY WATSON</b>	4,143,282
<b>DEUCE</b>	3,525,025	<b>SIMON GOTCH</b>	87073802
<b>D-GENERATION X</b>	3,728,991	<b>SIN CARA</b>	4,440,573; 4,485,548; 4,471,255; 4,384,485
<b>DH SMITH</b>	3,828,725	<b>SKIP SHEFFIELD</b>	3,934,004
<b>DIVAS OF DOOM</b>	4,121,920	<b>SKULL KING</b>	86/359,823; 86/359,826; 86/360,594
<b>DOINK THE CLOWN</b>	1,994,733	<b>SLAMMY</b>	2,267,980
<b>DOLPH ZIGGLER</b>	3,923,812	<b>SLAYOMI</b>	86/392,334

<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
<b>DOMINO</b>	3,525,026	<b>SMACKDOWN</b>	2,941,520; 2,928,460; 4,052,024; 4,672,593
<b>DREW GULAK</b>	87/214,383	<b>SMACKDOWN VS. RAW</b>	3,909,934
<b>DREW MCINTYRE</b>	3,933,603	<b>SMACKDOWN YOUR VOTE</b>	2,625,262
<b>DUDLEY BOYZ</b>	2,889,365	<b>SOCIAL OUTCASTS</b>	86/916,225; 86/916,215
<b>D-VON DUDLEY</b>	86/925,606	<b>SOLID GOLD</b>	87094930
<b>DX</b>	3,413,432	<b>SPIRIT SQUAD</b>	3,464,202
<b>EARN THE DAY</b>	87229693	<b>STACK DOWN</b>	86/011,478
<b>EAT SLEEP BREAK THE STREAK</b>	86/245,212	<b>STARDUST</b>	86/422,199
<b>ECW</b>	3,282,316; 2,462,643; 4,679,362	<b>STEPHANIE MCMAHON</b>	3,130,691; 3,450,782
<b>ECW ONE NIGHT STAND</b>	3,319,727; 3,446,487; 78/549,078	<b>STONE COLD</b>	3,684,739; 77/291,491
<b>ECW VIXENS</b>	3,584,808	<b>STONE COLD STEVE AUSTIN</b>	3,659,657
<b>EDDIE GUERRERO</b>	2,966,483; 3,159,940; 3,149,523	<b>SUMMER RAE</b>	86/090,839
<b>EDGE</b>	4,430,403; 2,649,476; 77/940,892	<b>SUMMERSLAM</b>	1,884,646; 4,748,785; 2,702,648; 4,052,025; 4,052,026
<b>ELIMINATION CHAMBER</b>	3,878,682; 4,451,591; 4,194,955; 4,094,125; 86/030,095	<b>SUNDAY NIGHT HEAT</b>	2,363,921
<b>ENZO</b>	87010913	<b>SUPERSTAR INK</b>	86/813,724
<b>ENZO AMORE</b>	87310864	<b>SUPLEX CITY</b>	86/581,713
<b>EPICO</b>	87073837	<b>SURVIVOR SERIES</b>	1,860,719; 1,563,878; 3,013,724; 3,985,965; 77/061,038
<b>EREBUS PICTURES</b>	86/704,216; 86/704,254; 86/704,251; 86/704,269; 86/704,196	<b>SWERVED</b>	86/579,887
<b>ERICK ROWAN</b>	86/924,968	<b>TABLE FOR 3</b>	86/813,736
<b>EUGENE</b>	3,024,662; 3,024,663	<b>TABOO TUESDAY</b>	3,194,947; 87/540,071
<b>EVA MARIE</b>	86/925,623	<b>TAMINA SNUKA</b>	86/087,198
<b>EVAN BOURNE</b>	3,720,967; 4,135,949	<b>TAZZ</b>	77/288,329
<b>EVE TORRES</b>	86/429,970	<b>TEAM BRING IT</b>	86/818,377
<b>EVOLUTION</b>	2,885,200	<b>TED DIBIASE</b>	3,809,219
<b>EXTREME CHAMPIONSHIP WRESTLING</b>	3,614,190; 78/073,881	<b>TENSAI</b>	4,782,305

<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
<b>EZEKIEL JACKSON</b>	3,933,604	<b>THE AUTHORITY</b>	86/528,551
<b>FATAL FOUR WAY</b>	3,945,860; 3,959,206; 3,945,863; 4,313,379	<b>THE BASH</b>	4,071,009
<b>FCW</b>	3,592,664; 85/711,451; 85/895,236	<b>THE BIG GUY</b>	86/864,365
<b>FEED ME MORE</b>	86/864,345	<b>THE BIGGEST PARTY OF THE SUMMER</b>	3,321,550
<b>FESTUS DALTON</b>	3,689,882	<b>THE BOOGEYMAN</b>	86/569,583
<b>FINLAY</b>	3,697,421	<b>THE CORRE</b>	4,218,593
<b>FINN BALOR</b>	4,899,322	<b>THE GAME</b>	2,858,755; 86/704,206
<b>FLORIDA CHAMPIONSHIP WRESTLING</b>	3,552,242; 3,727,374; 3,697,278	<b>THE GOLD STANDARD</b>	3,712,662
<b>FRIDAY NIGHT SMACKDOWN</b>	3,301,799	<b>THE GREAT AMERICAN BASH</b>	2,109,152; 2,194,671
<b>FUNKADACTYLS</b>	4,495,385	<b>THE GREAT KHALI</b>	3,420,447
<b>GLAMAZON</b>	3,828,716	<b>THE HERO IN ALL OF US</b>	87304757
<b>GLOBAL CRUISERWEIGHT SERIES</b>	86/912,043	<b>THE HEARTBREAK KID</b>	3,568,362
<b>GOLDEN TRUTH</b>	87095709	<b>THE HURRICANE</b>	2,681,342
<b>GOLDUST</b>	2,129,106; 2,675,279	<b>THE MIZ</b>	86/001,322
<b>GORGEOUS GEORGE</b>	77/758,976; 77/758,980; 86/846,807; 86/846,818; 86/846,827; 86/912,904	<b>THE MONDAY NIGHT WAR</b>	4,572,755
<b>GRAN METALIK</b>	87135488; 87135457; 87134942	<b>THE NEW DAY</b>	4,896,325; 86/901,772; 86/901,785
<b>HARD HITTING REALITY</b>	86/665,408	<b>THE REVIVAL</b>	86/892,625; 86/892,629; 86/892,624
<b>HARDCORE HOLLY</b>	3,118,011	<b>THE ROCK</b>	2,514,522; 2,633,988; 2,572,837; 2,572,838; 86/781,167; 86/788,029; 86/806,967; 86/806,924
<b>HBK</b>	3,565,556	<b>THE ROCK JUST BRING IT</b>	87270318
<b>HEATH SLATER</b>	3,933,991	<b>THE UNDERTAKER</b>	1,755,782
<b>HE HATE ME</b>	87192018	<b>THE WWE EXPERIENCE</b>	3,442,191
<b>HELL IN A CELL</b>	4,067,781; 4,074,565; 77/837,247; 3,912,015; 4,158,177	<b>THE WWE LIST</b>	86/813,745
<b>HHH</b>	3,091,120; 3,034,385; 2,841,514	<b>THEODORE LONG</b>	4,651,210
<b>HLR</b>	86/940,545	<b>TITANTRON</b>	4,084,430

<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
<b>HORNSWOGGLE</b>	3,489,434; 3,658,547	<b>TITUS O'NEIL</b>	86/087,187
<b>HUNICO</b>	4,535,705	<b>TJ PERKINS</b>	87215088
<b>HUNTER HEARST HELMSLEY</b>	3,838,295	<b>TLC: TABLES, LADDERS &amp; CHAIRS</b>	4,088,347; 4,164,913; 3,875,573; 4,459,369
<b>HUSTLE LOYALTY RESPECT</b>	3,937,302; 85/923,871; 85/923,831; 86/787,917	<b>TOO HOT FOR TV</b>	86/813,705
<b>IMMORTALS</b>	4,905,922; 86/426,191	<b>TONY NESE</b>	87214309
<b>IN YOUR HOUSE</b>	3,381,509	<b>TOP ROPE</b>	4,019,774
<b>INTERCONTINENTAL CHAMPION</b>	87091198	<b>TORITO</b>	4,589,869
<b>IT'S WAY OVER THE TOP</b>	86/160,847	<b>TORRIE WILSON</b>	78/403,211
<b>JAKKED</b>	4,867,443	<b>TOTAL DIVAS</b>	4,696,548; 4,902,232; 85/910,206; 85/910,202; 85/910,201; 85/910,200
<b>JAMIE NOBLE</b>	3,752,694	<b>TOUGH ENOUGH</b>	2,757,458; 4,063,650; 4,580,405; 4,023,271; 86/611,330; 86/611,338
<b>JASON JORDAN</b>	87/134,931	<b>TREVOR MURDOCH</b>	3,752,688
<b>JAZZ</b>	78/386,106	<b>TRIBUTE TO THE TROOPS</b>	3,641,851
<b>JBL</b>	3,959,446	<b>TRIPLE H</b>	2,780,659; 3,003,874; 2,991,990; 2,991,991
<b>JERRY "THE KING" LAWLER</b>	3,131,928	<b>TRIPLE THREAT</b>	2,768,658
<b>JEY USO</b>	4,096,086	<b>TWELVE ROUNDS</b>	3,689,999
<b>JIMMY USO</b>	4,096,085	<b>TYLER BREEZE</b>	86/836,541
<b>JIMMY WANG YANG</b>	3,570,860	<b>TYLER REKS</b>	4,096,082
<b>JINDER MAHAL</b>	4,535,704	<b>TYSON KIDD</b>	4,130,719
<b>JOHN CENA</b>	2,957,043; 3,169,452; 3,074,517; 3,088,504; 86/787,877; 86/787,885; 86/787,899	<b>ULTIMATE WARRIOR</b>	86/883,984; 86/884,027; 86/884,011; 86/883,994; 86/883,968
<b>JOHN MORRISON</b>	3,648,246; 3,909,942	<b>UMAGA</b>	3,420,413
<b>JOHNNY NITRO</b>	3,481,534	<b>UNDERTAKER</b>	1,771,405; 1,771,513; 1,755,482; 2,327,493; 1,980,341; 4,744,469; 86/421,791
<b>JTG</b>	3,684,601	<b>UNFORGIVEN</b>	2,576,331; 2,666,552; 2,525,314
<b>JUDGMENT DAY</b>	2,686,549; 2,621,441; 2,700,343; 4,056,805	<b>VENGEANCE</b>	2,978,955; 4,094,162
<b>JUST BRING IT</b>	86/424,758	<b>VICKIE GUERRERO</b>	3,719,034

<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
<b>JUSTIN GABRIEL</b>	3,933,998	<b>VICTORIA</b>	3,130,667; 3,024,639
<b>KAITLYN</b>	86/087,245	<b>VIKTOR</b>	87073814
<b>KALISTO</b>	86/925,604	<b>VINCE MCMAHON</b>	3,303,304
<b>KANE</b>	2,635,378; 3,261,934; 3,042,739; 87/751,145	<b>VIPER</b>	3,938,019
<b>KARL ANDERSON</b>	87017732	<b>VISCERA</b>	3,525,023
<b>KAYFABE</b>	85/553,175	<b>VLADIMIR KOZLOV</b>	3,720,970
<b>KELLY KELLY</b>	3,658,650	<b>WADE BARRETT</b>	3,933,990
<b>KENNY DYKSTRA</b>	3,752,686	<b>WARRIOR</b>	2,299,387
<b>KEVIN OWENS</b>	86/434,333	<b>WCW</b>	3,735,299; 2,964,395; 3,139,777; 3,502,189; 85/896,161
<b>KHARMA</b>	4,332,384	<b>WILLIAM REGAL</b>	3,550,963
<b>KING OF KINGS</b>	3,584,739; 78/802,596	<b>WORD LIFE</b>	3,209,593; 78/434,926
<b>KING OF THE RING</b>	87119716; 87119708	<b>WRESTLEFEST</b>	85/498,360
<b>KNUCKLEHEAD</b>	4,168,294; 4,168,293	<b>WRESTLEMANIA REWIND</b>	4,780,778
<b>KOFI KINGSTON</b>	3,720,955	<b>WRESTLEMANIACS</b>	86/517,906
<b>KONNOR</b>	87073822	<b>WRESTLEMANIART</b>	3,712,674
<b>LANA</b>	86/925,751	<b>WWE ACTIVE</b>	85/764,201; 85/790,729
<b>LANCE CADE</b>	3,752,687	<b>WWE ALL STARS</b>	4,046,290
<b>LAST OUTLAW</b>	86/569,613	<b>WWE AUTHENTIC WEAR</b>	4,045,760
<b>LAYLA</b>	3,781,553	<b>WW BASICS</b>	3,931,181
<b>WWE BATTLEGROUND</b>	4,622,177; 4,622,178; 4,622,175; 86/016,427; 86/016,416	<b>WWE NETWORK</b>	4,632,692; 4,614,127; 4,768,910; 4,621,480
<b>WWE BRAGGING RIGHTS</b>	4,159,815	<b>WWE NXT</b>	4,115,464; 3,945,846; 85/932,497; 86/030,958
<b>WWE BRAWL</b>	86/222,737; 86/030,074	<b>WWE PAYBACK</b>	4,744,095; 4,914,063; 85/860,084
<b>WWE BREAKING POINT</b>	3,917,665; 3,917,666; 77/744,186	<b>WWE RIDE ALONG</b>	86/842,720
<b>WWE CHAMPIONS</b>	86/787,291	<b>WWE RIVALRIES</b>	86/297,911
<b>WWE CLASSICS ON DEMAND</b>	3,981,909	<b>WWE ROADBLOCK</b>	86/921,626; 86/923,814; 86/923,825
<b>WWE COUNTDOWN</b>	4,589,113	<b>WWE SATURDAY MORNING SLAM</b>	4,495,592; 85/700,345; 85/696,472; 85/696,481
<b>WWE CULTURE SHOCK</b>	86/813,697	<b>WWE SLAM CITY</b>	4,773,383; 4,594,083; 4,657,055;

<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
			85/960,513; 85/960,457
<b>WWE EXTREME RULES</b>	3,850,887; 4,042,468; 4,042,467; 3,850,888; 4,905,420	<b>WWE SLAM SHOT</b>	85/836,836
<b>WWE FAST LANE</b>	86/433,483; 86/433,461; 86/433,434	<b>WWE SPOTLIGHT</b>	85/674,269; 85/671,711; 85/671,360
<b>WWE HALL OF FAME</b>	4,610,179	<b>WWE STUDIOS</b>	3,778,837
<b>WWE IMMORTALS</b>	86/426,172; 86/426,181	<b>WWE SUPERCHARGE</b>	86/090,725
<b>WWE INSIDER</b>	85/788,235	<b>WWE SUPERSTARS</b>	3,871,019; 77/626,294; 86/030,985; 86/030,989; 86/030,995
<b>WWE LEGENDS HOUSE</b>	4,589,123	<b>WWE TALKING SMACK</b>	87123129
<b>WWE LIVEWIRE</b>	4,466,922	<b>WWE THE HERO IN ALL OF US</b>	86/541,526
<b>WWE MAIN EVENT</b>	4,895,969; 4,495,510; 86/825,628	<b>WWE TOUGH TALK</b>	86/813,731
<b>WWE MATCH JUKEBOX</b>	3,081,964	<b>WWE UNFILTERED</b>	86/813,712
<b>WWE MUSIC POWER 10</b>	86/813,686	<b>WWE UNIVERSE</b>	3,854,270; 3,778,789; 87/781,425
<b>WWE UNLIMITED</b>	3,081,963	<b>YES MOVEMENT</b>	86/189,952
<b>WWESHOP</b>	86/806,867	<b>YOSHI TATSU</b>	4,096,083
<b>WWWYKI</b>	4,795,795	<b>YOU CAN'T SEE ME</b>	3,331,242
<b>XAVIER WOODS</b>	86/925,614	<b>ZACK RYDER</b>	4,047,339
<b>XFL</b>	85/720,169; 87/509,464	<b>ZEB COLTER</b>	86/086,152
<b>Y2J</b>	86/900,420	<b>THEN NOW FOREVER</b>	88287464
<b>3:16</b>	87/543,714	<b>LINCE DORADO</b>	87/495,153
<b>ABSOLUTION</b>	87/698,176	<b>LIV MORGAN</b>	87/396,540
<b>AKIRA TOZAWA</b>	87/438,719	<b>MATT HARDY</b>	87/495,122
<b>ALEISTER BLACK</b>	87/462,502	<b>MICKIE JAMES</b>	87/495,138
<b>ANDRADE "CIEN" ALMAS</b>	87/540,058	<b>MIZ &amp; MRS.</b>	87/759,981
<b>ARIYA DAIVARI</b>	87/438,710	<b>MUSTAFA ALI</b>	87/429,951
<b>BIG CASS</b>	87/420,403	<b>NIKKI CROSS</b>	87/397,307
<b>BILLIE KAY</b>	87/397,302	<b>ONEY LORCAN</b>	87/388,779
<b>BRUISERWEIGHT</b>	87/458,744	<b>PEYTON ROYCE</b>	87/397,295
<b>BUDDY MURPHY</b>	87/396,521	<b>PROJECT ROCK</b>	87/671,569
<b>DASH WILDER</b>	87/489,129	<b>RODERICK STRONG</b>	87/388,770

<b>MARK</b>	<b>REG/ SERIAL#(s)</b>	<b>MARK</b>	<b>REG/ SERIAL#(s)</b>
<b>ELIAS SAMSON</b>	87/390,591	<b>RUBY RIOT</b>	87/397,352
<b>EMBER MOON</b>	87/396,530	<b>SAMIR SINGH</b>	87/489,185
<b>ERIC YOUNG</b>	87/390,577	<b>SCOTT DAWSON</b>	87/489,116
<b>ERICK ROWAN</b>	87/398,739	<b>SOUTHAH REGIONAL WRESTLING</b>	87/381,445
<b>FOR THE LOVE OF FOOTBALL</b>	87/608,831	<b>SUNIL SINGH</b>	87/489,201
<b>GURV SIHRA</b>	87/438,741	<b>THE IRRESISTIBLE FORCE</b>	87/759,868
<b>HARDY BOYZ</b>	87/413,496; 87/413,487	<b>THE MAHARAJAH</b>	87/424,640
<b>HARV SIHRA</b>	87/438,832	<b>THE MOST PATRIOTIC SHOW ON TELEVISION</b>	87/714,086
<b>HOHO LUN</b>	87/429,959	<b>TJP</b>	87/431,241
<b>IMMUNE TO FEAR</b>	87/439,039	<b>TOMMASO CIAMPA</b>	87/540,049
<b>JACK GALLAGHER</b>	87/420,422	<b>TYE DILLINGER</b>	87/388,738
<b>JAMES ELLSWORTH</b>	87/489,043	<b>TYLER BATE</b>	87/429,937
<b>JEFF HARDY</b>	87/495,132	<b>WESLEY BLAKE</b>	87/390,610
<b>JOHNNY GARGANO</b>	87/540,031	<b>WWE MIXED MATCH CHALLENGE</b>	87/671,348
<b>KASSIUS OHNO</b>	87/388,759	<b>WWE ROCKSTARS</b>	87/460,177
<b>KONA REEVES</b>	87/390,598	<b>WWE STRAIGHT TO THE SOURCE</b>	87/751,107
<b>HALFTIME HEAT</b>	88278526	<b>WORLDS COLLIDE</b>	88248181
<b>LIGHTNING FIST</b>	88149831	<b>WCCW</b>	88134527
<b>THE GLORIOUS ONE</b>	88132522	<b>WORLD CLASS CHAMPIONSHIP WRESTLING</b>	88142576
<b>THE AWESOME ONE</b>	88132537	<b>FEARLESS NIKKI</b>	88132555
<b>PHENOMENAL ONE</b>	88132568	<b>WCW SATURDAY NIGHT</b>	88129083
<b>ALL STAR WRESTLING</b>	88127121	<b>WCW THUNDER</b>	88129097
<b>FALL BRAWL</b>	88127610	<b>HALLOWEEN HAVOC</b>	88127603
<b>WALK WITH ELIAS</b>	88103132	<b>STARRCADE</b>	88117085
<b>COREY GRAVES</b>	88082155	<b>BOBBY LASHLEY</b>	88073749
<b>BLUDGEON BROTHERS</b>	88054174	<b>VELVETEEN DREAM</b>	88054185



<b><u>MARK</u></b>	<b><u>REG/ SERIAL#(s)</u></b>	<b><u>MARK</u></b>	<b><u>REG/ SERIAL#(s)</u></b>
<b>WOKEN WARRIOR</b>	87873956	<b>GLOBAL LOCALIZATION</b>	87867138
<b>SARAH LOGAN</b>	88073309	<b>MIKE KANELIS</b>	88073301
<b>BRITISH STRONG STYLE</b>	88003965	<b>ADAM COLE</b>	88103135

## **EXHIBIT 2**

**COMMON LAW INTELLECTUAL PROPERTY  
OF WORLD WRESTLING ENTERTAINMENT, INC.**


**DESIGNS**



			or 	
				
				
				
				

100% BAD LASS.
FEARLESS
SUPLEX CITY
MACHO MAN RANDY SAVAGE
TAPOUT
ATTITUDE ADJUSTMENT
TEXAS RATTLESNAKE
BADDEST ON THE PLANET
GLORIOUS
BATISTA
THE BAR
PYTHON POWER
BEAST INCARNATE
RAW IS JERICHO
OUTTA NOWHERE
BOOGEYMAN
UNSTABLE
BOOKER T
ROMAN EMPIRE
BRIE MODE
RIC FLAIR
BULLETPROOF
STAY FEARLESS
CAN I GET A HUG
CATCH YOUR BREATH
STING
CERTIFIED G
DEADMAN INC.
BRUTUS THE BARBER
BEEFCAKE
RICKY “THE DRAGON”
STEAMBOAT
DIRTY DEEDS
DO MORE. FEAR LESS.
VENOM IN MY VEINS
DOWN SINCE DAY ONE
DOWN WITH THE MACHINE
WOO DAT
EAT SLEEP CONQUER REPEAT
EDDIE GUERERO
THE SHOWSTOPPER
FADE TO BLACK
FASHION PATROL

LOSING STREAK
STYLIN & PROFILIN
AMBROSE ASYLUM
MANKIND
FEEL THE POWER
MONSTER OF ALL MONSTERS
FROM ASHES TO EMPIRE
MR. WRESTLEMANIA
NAKAMURA
GLORIOUS HAS ARRIVED
THE ARCHITECT
GOLDUST
THE CHAMP IS HERE
HERE COMES THE MONEY
HIT HARD HIT OFTEN
HITMAN
THE NEW FACE OF FEAR
NO AUTOGRAPHS PLEASE
IT’S TRUE IT’S TRUE
HULKAMANIA
I AM PHENOMENAL
I BRING THE FIGHT
I’M A HUGGER
BRETT HART
I’M THE BOSS
IN SHANE WE TRUST
CEREBRAL ASSASSIN
IRON SHEIK
IT’S FEEDING TIME
IT’S MY YARD
IT’S TOO BAD I’M TOO GOOD
WM
JAKE THE SNAKE ROBERTS
U CAN’T SEE ME
JOHNNY WRESTLING
KEEP CALM AND NEVER GIVE UP
KO
TWISTED BLISS
LAYETH THE SMACKDOWN
TWO WORDS
LITTLE MISS BLISS
AJ STYLES

FEARLESS MIKE
TALKING SOULS AND DIGGING HOLES
APEX PREDATOR
MONSTER AMONG US
FIGHT OWENS FIGHT
THAT’S WHAT I DO
BARON CORBIN
GO BRIE MODE
NEW DAY POPS
HONKY TONK MAN
ONE VERSUS ALL
ORIGINAL BRO
BIG E
PAWS OUT, CLAWS OUT
BEAST FOR BUSINESS
RAISE YOUR LIMITS
SWAFT
BIG CASS
RESPECT EARN IT
HULKAMANIAS RUNNING WILD
JIM ROSS
RIOTT SQUAD
RISE ABOVE
KURT ANGLE
RKO
EDGE
RONDA ROUSEY
ROWDY
SANITY
YOU KNOW IT
SGT. SLAUGHTER
SPARE NO ONE, SPEAR EVERYONE
SPLX-CTY
FEED ME MORE
STEP UP OR STEP ASIDE
STEPH FOR BUSINESS
WALK WITH ELIAS
STONE COLD STEVE AUSTIN
STRONG STYLE
LEGIT BOSS
MACHO MAN

ANDRE THE GIANT
FEEL THE GLOW
TEDDY LONG
BAD NEWS BARRETT
THAT DAMN GOOD
GET THESE HANDS
NATURE BOY
THE ARTIST
BAYLEY’S GONNA HUG YOU
HELL YEAH
THE HOUSE THAT AJ BUILT
THE LEGIT BOSS
HULK HOGAN
DO THE WORK
THE ULTIMATE THRILL RIDE
DIAMOND DALLAS PAGE
TOP GUYS
TOTALLY FEARLESS
TRISH STRATUS
BOLIEVE
TO BE THE MAN
REBORN BY FATE
UNDISPUTED ERA
EARN IT
UP UP DOWN DOWN
VENGEANCE UNEARTHED
RISE ABOVE HATE
I’M AWESOME
WHO WHO WHO
BURN IT DOWN
WM34
WOKEN
IRON FIST, IRON RULE
WOOOOO DAT
YES YES YES
YOKOZUNA
YOU CAN’T STOP ME
DELETE



## **EXHIBIT 3**

<b><u>Date</u></b>	<b><u>Venue WWE TOUR SCHEDULE (MARCH 2019 - APRIL 2020)</u></b> <b><u>SUBJECT TO CHANGE</u></b>
04/04/2019	Brooklyn Pier 12,Brooklyn,NY
04/05/2019	Barclays Center NXT,Brooklyn,NY
04/05/2019	Barclays Center,Brooklyn,NY
04/05/2019	Brooklyn Pier 12,Brooklyn,NY
04/06/2019	Brooklyn Pier 12,Brooklyn,NY
04/06/2019	Barclays Center,Brooklyn,NY
04/06/2019	Barclays Center NXT,Brooklyn,NY
04/07/2019	Brooklyn Pier 12,Brooklyn,NY
04/07/2019	Metlife Stadium,East Rutherford,NJ
04/08/2019	Barclays Center,Brooklyn,NY
04/08/2019	Brooklyn Pier 12,Brooklyn,NY
04/09/2019	Barclays Center,Brooklyn,NY
04/10/2019	Full Sail University ,Orlando,FL
04/12/2019	Minnreg Hall,Largo,FL
04/13/2019	Sanford Civic Center,Sanford,FL
04/15/2019	Bell Centre,Montreal ,QC
04/16/2019	Bell Centre,Montreal ,QC
04/18/2019	Lakeland Armory,Lakeland,FL
04/19/2019	Chaifetz Arena,St. Louis,MO
04/19/2019	Enterprise Center,St. Louis,MO
04/19/2019	Jacksonville Armory,Jacksonville,FL
04/19/2019	Braehead Arena - UKC,Glasgow,United Kingdom
04/20/2019	Alliant Energy Center,Madison,WI
04/20/2019	Braehead Arena - UKC,Glasgow,United Kingdom
04/20/2019	Bank of Springfield Center,Springfield,IL
04/20/2019	UACDC Complex,Tampa,FL
04/21/2019	Tax Slayer Center,Moline,IL
04/21/2019	Mayo Civic Center,Rochester,MN
04/22/2019	Tyson Events Center,Sioux City,IA
04/22/2019	Wells Fargo Arena,Des Moines,IA
04/23/2019	Pinnacle Bank Arena,Lincoln,NE
04/25/2019	Ralston Arena,Omaha,NE
04/25/2019	Orlando Live Events Center,Orlando,FL
04/26/2019	Midtown Cultural & Education Center,Daytona Beach,FL
04/26/2019	River Center,Davenport,IA

04/27/2019	Dade City Armory ,Dade City,FL
04/27/2019	Tuner Hall Ballroom,Milwaukee,WI
04/28/2019	E.A. Diddle Arena,Bowling Green,KY
04/28/2019	Roy Wilkins Auditorium ,Saint Paul,MN
04/29/2019	Big Sandy Superstore Arena,Huntington,WV
04/29/2019	Lexington Cntr Rupp Arena,Lexington,KY
04/30/2019	Schottenstein Center,Columbus,OH
05/01/2019	Full Sail University ,Orlando,FL
05/02/2019	Melbourne Auditorium - NXT,Melbourne,FL
05/03/2019	Palm Beach Convention Center,West Palm Beach,FL
05/04/2019	Havert L. Fenn Center,Fort Pierce ,FL
05/05/2019	Ford Center Evansville,Evansville,IN
05/06/2019	U.S. Bank Arena,Cincinnati,OH
05/06/2019	The Corbin Arena,Corbin,KY
05/07/2019	KFC Yum Center,Louisville,KY
05/08/2019	The SSE Arena,Belfast,United Kingdom
05/09/2019	3Arena,Dublin,Ireland
05/09/2019	Forest National,Brussels,Belgium
05/09/2019	Minnreg Hall,Largo,FL
05/10/2019	Highlands Today Center,Sebring ,FL
05/10/2019	Marseille Aix,Marseille,France
05/10/2019	Helsinki Ice Arena,Helsinki,Finland
05/11/2019	RDS Arena,Genoa,Italy
05/11/2019	Utilita Arena ,Newcastle,United Kingdom
05/11/2019	Hovet Arena,Stockholm,Sweden
05/11/2019	St. Augustine Armory,Saint Augustine,FL
05/12/2019	M&S Bank Arena ,Liverpool,United Kingdom
05/12/2019	Spektrum,Oslo,Norway
05/13/2019	O2 Arena,London,United Kingdom
05/13/2019	Bournemouth International Centre,Bournemouth,United Kingdom
05/14/2019	O2 Arena,London,United Kingdom
05/14/2019	Accorhotels Arena,Paris,France
05/15/2019	Resorts World Arena,Birmingham,United Kingdom
05/15/2019	Magdeburg GETEC Arena,Magdeburg,Germany
05/16/2019	FlyDSA Arena ,Sheffield,United Kingdom
05/16/2019	Sands Event Center,Bethlehem,PA
05/16/2019	UACDC Complex,Tampa,FL

05/16/2019	Barclaycard Arena,HAMBURG,Germany
05/17/2019	Mercedes Benz Arena ,Berlin,Germany
05/17/2019	Fillmore Philly ,Philadelphia,PA
05/17/2019	St. Petersburg Armory,Saint Petersburg,FL
05/17/2019	Motorpoint Arena,Cardiff,United Kingdom
05/18/2019	APG Federal Credit Union Arena,Bel Air,MD
05/18/2019	Sanford Civic Center,Sanford,FL
05/18/2019	Messe Erfurt,Erfurt,Germany
05/19/2019	Asbury Park Convention Hall,Asbury Park,NJ
05/19/2019	XL Center,Hartford,CT
05/19/2019	St. Jakobstadion ,Basel,Switzerland
05/20/2019	Tsongas Center @ UMass Lowell,Lowell,MA
05/20/2019	Times Union Center,Albany,NY
05/21/2019	Dunkin Donuts Center ,Providence,RI
05/23/2019	Bartow Armory,Bartow,FL
05/24/2019	Fieldhouse at Watsco Center,Coral Gables,FL
05/25/2019	Midtown Cultural & Education Center,Daytona Beach,FL
05/27/2019	Tony's Pizza Events Center,Salina,KS
05/27/2019	Sprint Center,Kansas City,MO
05/28/2019	BOK Center,Tulsa,OK
05/30/2019	Orlando Live Events Center,Orlando,FL
05/31/2019	Santa Ana Star Center,Rio Rancho,NM
05/31/2019	Jacksonville Armory,Jacksonville,FL
06/01/2019	Havert L. Fenn Center,Fort Pierce ,FL
06/01/2019	Extraco Events Center,Waco,TX
06/01/2019	United Supermarkets Arena,Lubbock,TX
06/02/2019	Reed Arena,College Station,TX
06/02/2019	Foster Communications Coliseum,San Angelo,TX
06/03/2019	Frank Erwin Center,Austin,TX
06/03/2019	American Bank Center Arena,Corpus Christi,TX
06/04/2019	Sames Auto Arena,Laredo,TX
06/06/2019	Minnreq Hall,Largo,FL
06/07/2019	Maverik Center,Salt Lake City,UT
06/07/2019	UACDC Complex,Tampa,FL
06/08/2019	Pepsi Center,Denver,CO
06/08/2019	Taco Bell Arena @ Boise State,Boise,ID
06/08/2019	SJSU Event Center,San Jose,CA

06/08/2019	Oracle Arena,Oakland,CA
06/09/2019	Save Mart Center,Fresno,CA
06/09/2019	Stockton Arena,Stockton,CA
06/10/2019	SAP Center ,San Jose,CA
06/10/2019	Reno -Sparks Event Center,Reno,NV
06/11/2019	Golden 1 Center,Sacramento,CA
06/12/2019	Full Sail University ,Orlando,FL
06/13/2019	Full Sail University ,Orlando,FL
06/14/2019	Download Festival - UKC,Donington Park,United Kingdom
06/14/2019	Hilton Ocala ,Ocala,FL
06/14/2019	Bell MTS Place,Winnipeg,MB
06/15/2019	Download Festival - UKC,Donington Park,United Kingdom
06/15/2019	Orlando Live Events Center,Orlando,FL
06/15/2019	Honda Center,Anaheim,CA
06/16/2019	Pechanga Arena ,San Diego,CA
06/16/2019	Download Festival - UKC,Donington Park,United Kingdom
06/17/2019	Staples Center,Los Angeles,CA
06/17/2019	Palm Springs Convention Center,Palm Springs,CA
06/18/2019	Citizens Business Bank Arena,Ontario,CA
06/20/2019	Aztec Theatre,San Antonio,TX
06/21/2019	Revention Music Center,Houston,TX
06/22/2019	Save On Foods Memorial Centre,Victoria,BC
06/22/2019	Adams Center,Missoula,MT
06/22/2019	South Side Ballroom,Dallas,TX
06/23/2019	The Criterion,Oklahoma City,OK
06/23/2019	Spokane Arena,Spokane,WA
06/23/2019	Abbotsford Entertainment & Sports Centre,Abbotsford,Canada
06/24/2019	Tacoma Dome,Tacoma,WA
06/24/2019	Toyota Center,Kennewick,WA
06/24/2019	Angel of the Winds Arena,Everett,WA
06/25/2019	Moda Center,Portland,OR
06/27/2019	Singapore Indoor Stadium,Singapore,Singapore
06/27/2019	Dade City Armory ,Dade City,FL
06/28/2019	Crystal River Armory,Crystal River,FL
06/28/2019	Ryoquku Arena,Tokyo,Japan
06/29/2019	Mississippi St. Fair Coliseum,Jackson,MS
06/29/2019	Ryoquku Arena,Tokyo,Japan

06/29/2019	Venice Community Center,Venice,FL
06/30/2019	Monroe Civic Center,Monroe,LA
07/01/2019	American Airlines Center,Dallas,TX
07/01/2019	Bernard G. Johnson Coliseum,Huntsville,TX
07/02/2019	AT&T Center,San Antonio,TX
07/06/2019	Capital One Arena,Washington,DC
07/06/2019	Webster Bank Arena at Harbor Yard,Bridgeport,CT
07/07/2019	The Floyd L Maines Veterans Memorial Arena,Binghamton,NY
07/07/2019	Mohegan Sun Arena @ Casey Plaza,Wilkes Barre,PA
07/08/2019	Glens Falls Civic Center,Glens Falls,NY
07/08/2019	Prudential Center,Newark,NJ
07/09/2019	SNHU Arena,Manchester,NH
07/12/2019	Minnreq Hall,Largo,FL
07/12/2019	Minnreq Hall,Largo,FL
07/12/2019	Augusta Civic Center,Augusta,ME
07/13/2019	Mass Mutual Center,Springfield,MA
07/13/2019	VSU Multipurpose Center,Petersburg,VA
07/14/2019	Wells Fargo Center,Philadelphia,PA
07/15/2019	Nassau Coliseum,Uniondale,NY
07/15/2019	Mid-Hudson Civic Center,Poughkeepsie,NY
07/16/2019	DCU Center,Worcester,MA
07/18/2019	Lakeland Armory,Lakeland,FL
07/19/2019	Plymouth Pavilions - UKC,Plymouth,United Kingdom
07/19/2019	Santander Arena,Reading,PA
07/19/2019	UACDC Complex,Tampa,FL
07/20/2019	Columbus Civic Center,Columbus,GA
07/20/2019	Wildwoods Convention Center,Wildwood,NJ
07/20/2019	Plymouth Pavilions - UKC,Plymouth,United Kingdom
07/21/2019	Amway Center,Orlando,FL
07/21/2019	Pensacola Bay Center,Pensacola,FL
07/22/2019	Amalie Arena,Tampa,FL
07/22/2019	Hertz Arena,Fort Myers,FL
07/23/2019	American Airlines Arena,Miami,FL
07/25/2019	Orlando Live Events Center,Orlando,FL
07/25/2019	North Charleston Conv. Center,North Charleston,SC
07/26/2019	Jacksonville Armory,Jacksonville,FL
07/26/2019	Four States Entertainment Ctr,Texarkana,AR

07/26/2019	Township Auditorium - NXT,Columbia,SC
07/27/2019	Center Stage Theatre,Atlanta,GA
07/27/2019	Chesapeake Energy Arena ,Oklahoma City,OK
07/27/2019	Bridgestone Arena,Nashville,TN
07/27/2019	Havert L. Fenn Center,Fort Pierce ,FL
07/28/2019	JQH Arena,Springfield,MO
07/28/2019	Cabarrus Arena - NXT,Concord,NC
07/28/2019	Show Me Center,Cape Girardeau,MO
07/29/2019	Black River Coliseum,Poplar Bluff,MO
07/29/2019	Verizon Arena,North Little Rock,AR
07/30/2019	Fedexforum,Memphis,TN
08/02/2019	Allen County Expo Center,Ft. Wayne,IN
08/03/2019	E.A. Diddle Arena,Bowling Green,KY
08/03/2019	Huntington Center,Toledo,OH
08/03/2019	Minnreq Hall,Largo,FL
08/04/2019	Erie Insurance Arena,Erie,PA
08/04/2019	David S. Palmer Arena,Danville,IL
08/05/2019	Wings Event Center,Kalamazoo,MI
08/05/2019	PPG Paints Arena,Pittsburgh,PA
08/06/2019	Little Caesar's Arena,Detroit,MI
08/08/2019	Albany Capital Center,Albany,NY
08/09/2019	Buffalo River Works,Buffalo,NY
08/10/2019	Scotiabank Arena - NXT,Toronto,ON
08/11/2019	Scotiabank Arena,Toronto,ON
08/12/2019	Scotiabank Arena,Toronto,ON
08/13/2019	Scotiabank Arena,Toronto,ON
08/15/2019	Full Sail University ,Orlando,FL
08/16/2019	Bismarck Event Center,Bismarck,ND
08/17/2019	Alerus Center,Grand Forks,ND
08/17/2019	Toyota Center,Houston,TX
08/17/2019	Midtown Cultural & Education Center,Daytona Beach,FL
08/18/2019	CHI Health Center ,Omaha,NE
08/18/2019	Fargodome,Fargo,ND
08/19/2019	Xcel Energy Center,St Paul,MN
08/19/2019	Verizon Wireless Center,Mankato,MN
08/20/2019	Denny Sanford Premier Center,Sioux Falls,SD
08/22/2019	Movistar Arena,Bogota,Columbia

08/23/2019	Cajundome,Lafayette,LA
08/23/2019	Sanford Civic Center,Sanford,FL
08/23/2019	Movistar Arena,Bogota,Columbia
08/24/2019	Mobile Civic Center,Mobile,AL
08/24/2019	Jockey Club,Lima,Peru
08/25/2019	MS Coast Col. And Conv. Center,Biloxi,MS
08/25/2019	Coliseo Roberto Duran,Panama,Panama
08/26/2019	Smoothie King Center,New Orleans,LA
08/27/2019	Raising Cane's River Center ,Baton Rouge,LA
08/29/2019	Orlando Live Events Center,Orlando,FL
08/30/2019	Cross Insurance Center,Bangor,ME
08/30/2019	Jacksonville Armory,Jacksonville,FL
08/31/2019	Havert L. Fenn Center,Fort Pierce ,FL
08/31/2019	Cross Insurance Arena,Portland,ME
09/01/2019	Westchester County Center,White Plains,NY
09/02/2019	Bob Carpenter Center,Newark,DE
09/02/2019	Royal Farms Arena,Baltimore,MD
09/03/2019	Norfolk Scope Arena,Norfolk,VA
09/05/2019	Movistar Arena,Santiago,Chile
09/06/2019	UACDC Complex,Tampa,FL
09/06/2019	Harbour Station,Saint John,NB
09/06/2019	Luna Park,Buenos Aires,Argentina
09/07/2019	Luna Park,Buenos Aires,Argentina
09/07/2019	Highlands Today Center,Sebring ,FL
09/07/2019	Antel Arena,Montevideo,Uruguay
09/07/2019	Halifax Forum,Halifax,NS
09/08/2019	War Memorial Arena,Syracuse,NY
09/08/2019	Ginásio do Ibirapuera,São Paulo,Brazil
09/09/2019	Madison Square Garden,New York,NY
09/10/2019	Madison Square Garden,New York,NY
09/11/2019	Full Sail University ,Orlando,FL
09/12/2019	Full Sail University ,Orlando,FL
09/13/2019	Mckenzie Arena @ UTC,Chattanooga,TN
09/14/2019	Macon Coliseum,Macon,GA
09/14/2019	Dade City Armory ,Dade City,FL
09/15/2019	State Farm Arena ,Atlanta,GA
09/16/2019	Colonial Life Arena,Columbia,SC



09/16/2019	Thompson/Boling Assembly Arena,Knoxville,TN
09/17/2019	Greensboro Coliseum ,Greensboro,NC
09/19/2019	Midtown Cultural & Education Center,Daytona Beach,FL
09/20/2019	Jacksonville Armory,Jacksonville,FL
09/20/2019	Corral Arena,Calgary,AB
09/20/2019	Mall of Asia,Manila,Philippines
09/21/2019	Rogers Place,Edmonton,Canada
09/21/2019	Mercedez Benz Arena,Shanghai,China
09/22/2019	Neal S. Blaisdell Center,Honolulu,HI
09/23/2019	Chase Center,San Francisco,CA
09/24/2019	Chase Center,San Francisco,CA
09/26/2019	Hy - Vee Hall ,Des Moines,IA
09/27/2019	Silverstein Eye Centers Arena,Independence ,MO
09/27/2019	Orlando Live Events Center,Orlando,FL
09/27/2019	Don Haskins Center,El Paso,TX
09/28/2019	Family Arena - NXT,Saint Charles,MO
09/28/2019	Havert L. Fenn Center,Fort Pierce ,FL
09/28/2019	Tucson Convention Center,Tucson,AZ
09/29/2019	Prescott Valley Event Center,Prescott Valley,AZ
09/29/2019	Landers Center,Southaven,MS
09/30/2019	Talking Stick Resort Arena,Phoenix,AZ
10/03/2019	Pechanga Arena ,San Diego,CA
10/03/2019	Sanford Civic Center,Sanford,FL
10/04/2019	Staples Center,Los Angeles,CA
10/05/2019	Stockton Arena,Stockton,CA
10/05/2019	Selland Arena,Fresno,CA
10/05/2019	Minnreg Hall,Largo,FL
10/06/2019	Golden 1 Center,Sacramento,CA
10/07/2019	Rabobank Arena,Bakersfield,CA
10/10/2019	Budweiser Events Center ,Loveland,CO
10/11/2019	Fieldhouse at Watsco Center,Coral Gables,FL
10/11/2019	Pepsi Center,Denver,CO
10/11/2019	Carlson Center,Fairbanks,AK
10/12/2019	Sullivan Arena,Anchorage,AK
10/12/2019	Casper Events Center,Casper,WY
10/12/2019	Palm Beach Convention Center,West Palm Beach,FL
10/13/2019	Rushmore Plaza Civic Center,Rapid City,SD

10/13/2019	Honda Center,Anaheim,CA
10/14/2019	T-Mobile Arena,Las Vegas,NV
10/17/2019	Veterans Memorial Coliseum,Portland,OR
10/17/2019	Wright State University's Nutter Center ,Dayton,OH
10/18/2019	Havert L. Fenn Center,Fort Pierce ,FL
10/18/2019	Nationwide Arena,Columbus,OH
10/18/2019	The Paramount Theatre,Seattle,WA
10/19/2019	Midtown Cultural & Education Center,Daytona Beach,FL
10/19/2019	Agrodome - NXT,Vancouver,BC
10/19/2019	CURE Insurance Arena ,Trenton,NJ
10/20/2019	Prospera Place - NXT,Kelowna,BC
10/20/2019	Kovalchick Complex,Indiana,PA
10/21/2019	Quickens Loans Arena,Cleveland,OH
10/21/2019	Oudos Bank Arena,Sydney,Australia
10/22/2019	Brisbane Entertainment Centre,Brisbane,Australia
10/23/2019	Rod Laver Arena,Melbourne,Australia
10/24/2019	Full Sail University ,Orlando,FL
10/24/2019	Coliseo General Rumiñahui,Quito,Ecuador
10/25/2019	Parque Viva,San Jose,Costa Rica
10/25/2019	Sprint Center,Kansas City,MO
10/26/2019	Coliseo De Puerto Rico,San Juan,Puerto Rico
10/28/2019	Enterprise Center,St. Louis,MO
10/31/2019	Orlando Live Events Center,Orlando,FL
11/01/2019	Prudential Center,Newark,NJ
11/01/2019	King Saud University Stadium,Riyadh,Saudi Arabia
11/03/2019	Blue Cross Arena,Rochester,NY
11/03/2019	Nelson Mandela Forum,Florence,Italy
11/04/2019	Times Union Center,Albany,NY
11/04/2019	Mediolanum Forum,Milan,Italy
11/05/2019	Motorpoint Arena Nottingham,Nottingham,United Kingdom
11/06/2019	Birmingham BC Arena,Birmingham,United Kingdom
11/06/2019	3Arena,Dublin,Ireland
11/07/2019	First Direct Arena,Leeds,United Kingdom
11/07/2019	Brighton Centre,Brighton,United Kingdom
11/07/2019	Hilton Ocala ,Ocala,FL
11/08/2019	The SSE Wembley Arena,London,United Kingdom
11/08/2019	Manchester Arena ,Manchester,United Kingdom

11/09/2019	Arena @ Butlins,Minehead,United Kingdom
11/09/2019	Palacio Vistalegre,Madrid,Spain
11/10/2019	PABELLON SAN PABLO,Seville,Spain
11/10/2019	BHGE Arena Aberdeen,Aberdeen,United Kingdom
11/11/2019	The SSE Hydro,Glasgow,United Kingdom
11/11/2019	Wiener Stadthalle,Vienna,Austria
11/12/2019	Ziggo Dome,Amsterdam,Netherlands
11/12/2019	Zenith Arena,Lille,France
11/13/2019	Messe Erfurt,Erfurt,Germany
11/13/2019	Hallenstadion,Zurich,Switzerland
11/14/2019	Minnreq Hall,Largo,FL
11/14/2019	SAP Arena,Mannheim,Germany
11/15/2019	Wells Fargo Center,Philadelphia,PA
11/15/2019	Donau Arena,Regensburg,Germany
11/16/2019	ISS Dome,Dusseldorf,Germany
11/16/2019	Midtown Cultural & Education Center,Daytona Beach,FL
11/18/2019	T.D. Garden,Boston,MA
11/21/2019	Tuner Hall Ballroom,Milwaukee,WI
11/22/2019	Allstate Arena,Chicago,IL
11/22/2019	Egyptian Room,Indianapolis,IN
11/23/2019	Allstate Arena - NXT,Chicago,IL
11/24/2019	Allstate Arena,Chicago,IL
11/25/2019	Allstate Arena,Chicago,IL
11/29/2019	Legacy Arena,Birmingham,AL
11/29/2019	Verizon Arena,North Little Rock,AR
11/30/2019	Infinite Energy Center,Duluth,GA
11/30/2019	Arena Ciudad de Mexico,Mexico City,Mexico
12/01/2019	Arena Monterrey,Monterrey,NL
12/01/2019	Von Braun Civic Center,Huntsville,AL
12/02/2019	Legacy Arena,Birmingham,AL
12/04/2019	Full Sail University ,Orlando,FL
12/05/2019	Hampton Coliseum,Hampton,VA
12/06/2019	Crown Coliseum,Fayetteville,NC
12/07/2019	Veteran's Memorial Arena,Jacksonville,FL
12/08/2019	Ocean Center,Daytona Beach,FL
12/08/2019	James Brown Arena,Augusta,GA
12/09/2019	Bon Secours Wellness Arena,Greenville,SC

12/12/2019	Van Andel Arena,Grand Rapids,MI
12/13/2019	Fiserv Forum,Milwaukee,WI
12/13/2019	Havert L. Fenn Center,Fort Pierce ,FL
12/14/2019	Midtown Cultural & Education Center,Daytona Beach,FL
12/14/2019	AMSOIL Arena,Duluth,MN
12/14/2019	US Cellular Center,Cedar Rapids,IA
12/15/2019	Target Center,Minneapolis,MN
12/16/2019	Wells Fargo Arena,Des Moines,IA
12/19/2019	DCU Center,Worcester,MA
12/20/2019	Barclays Center,Brooklyn,NY
12/21/2019	TBD
12/21/2019	Kitchener Memorial Auditorium,Kitchener,ON
12/22/2019	TBD
12/22/2019	Budweiser Gardens,London,Canada
12/23/2019	KeyBank Center,Buffalo,NY
12/26/2019	Madison Square Garden,New York,NY
12/26/2019	U.S. Bank Arena,Cincinnati,OH
12/27/2019	Little Caesar's Arena,Detroit,MI
12/27/2019	PPG Paints Arena,Pittsburgh,PA
12/28/2019	Coca-Cola Coliseum ,Toronto,ON
12/28/2019	Giant Center,Hershey,PA
12/29/2019	Royal Farms Arena,Baltimore,MD
12/29/2019	Bell Centre,Montreal ,QC
12/30/2019	XL Center,Hartford,CT
12/30/2019	Staples Center,Los Angeles,CA
1/3/2020	Fedexforum,Memphis,TN
1/6/2020	KFC Yum Center,Louisville,KY
1/10/2020	BMO Harris Bank Center,Rockford,IL
1/13/2020	CHI Health Center ,Omaha,NE
1/17/2020	Chesapeake Energy Arena ,Oklahoma City,OK
1/20/2020	Intrust Bank Arena, Wichita, KS
1/24/2020	AT&T Center,San Antonio,TX
1/25/2020	Toyota Center,Houston,TX
1/26/2020	Minute Maid Park, Houston, TX
1/27/2020	American Airlines Center,Dallas,TX
1/31/2020	Gila River Center, Glendale, AZ
2/3/2020	Vivint Smart Home Arena, Salt lake City, UT

2/7/2020	T-Mobile Arena,Las Vegas,NV
2/10/2020	SAP Center ,San Jose,CA
2/14/2020	Rogers Arena, Vancouver, Canada
2/16/2020	Moda Center,Portland,OR
2/17/2020	Tacoma Dome,Tacoma,WA
2/21/2020	Tyson Events Center,Sioux City,IA
2/24/2020	Sprint Center,Kansas City,MO
2/28/2020	Spectrum Center, Charlotte, NC
3/2/2020	Nassau Coliseum,Uniondale,NY
3/6/2020	TD Garden, Boston, MA
3/8/2020	Wells Fargo Center,Philadelphia,PA
3/9/2020	Capital One Arena,Washington,DC
3/13/2020	ScotiaBank Arena, Toronto, ON
3/14/2020	Little Caesar's Arena,Detroit,MI
3/16/2020	PPG Paints Arena,Pittsburgh,PA
3/20/2020	Bridgestone Arena,Nashville,TN
3/23/2020	Dickies Arena, Ft. Worth, TX
3/27/2020	Allstate Arena, Chicago, IL
3/30/1930	State Farm Arena ,Atlanta,GA
4/3/2020	Amalie Arena,Tampa,FL
4/4/2020	Amalie Arena,Tampa,FL
4/5/2020	Raymond James Stadium, Tampa, FL
4/6/2020	Amalie Arena,Tampa,FL

## EXHIBIT 2

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Wrestling Entertainment, Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

WORLD WRESTLING  
ENTERTAINMENT, INC.,

Plaintiff,

vs.

VARIOUS JOHN AND JANE DOES,  
and VARIOUS XYZ CORPORATIONS,

Defendants.

Civil Action No.:

**[PROPOSED] TEMPORARY  
RESTRAINING ORDER, ORDER  
FOR SEIZURE OF COUNTERFEIT  
MARKED GOODS, AND ORDER  
TO SHOW CAUSE WHY A  
PRELIMINARY INJUNCTION  
SHOULD NOT ISSUE**

Based upon the Verified Complaint, the Ex Parte Motion For Temporary Restraining Order, Order for Seizure of Counterfeit Marked Goods and Order to Show Cause Why a Preliminary Injunction Should Not Issue (the “Motion”), the Memorandum and Declaration submitted in support of the Motion, and all other pleadings and proceedings presented to the Court, and good cause having been shown;

**IT APPEARING TO THE COURT** that (1) Plaintiff World Wrestling Entertainment, Inc. (“WWE”), exclusively owns or controls the trademarks and service marks set forth in Exhibits 1 and 2 hereto (collectively, the “WWE Marks”); (2) WWE has the exclusive right to use and license others to use the WWE Marks on goods and to use the WWE Marks in connection with rendering services; (3) WWE exclusively owns or controls all right, title and interest in the names, likenesses and rights of publicity for its current wrestlers; (4) the WWE Marks are distinctive and are widely recognized by the public; and (5) goods that bear the WWE Marks or the names or likenesses of any of WWE’s current wrestlers shall be known herein as the “Enjoined Goods”;

**AND IT APPEARING TO THE COURT** that (1) Defendants, who are not licensed or authorized by WWE to use the WWE Marks, and those acting in concert or participation with them, are or will be present on the premises or within a two-mile radius of WWE’s WrestleMania<sup>®</sup> 35 event that will take place on April 7 at MetLife Stadium and on the premises or within a two-mile radius additional WWE-sponsored activities related to WrestleMania<sup>®</sup> 35, such as meet and greets with its Superstars, that will occur on April 5 and 6, 2019 in other parts of New Jersey (the “WrestleMania<sup>®</sup> 35 Weekend Events”), for the purpose of manufacturing, distributing, offering for sale, and selling Enjoined Goods and (2) Defendants, and those acting in concert or participation with them, will continue to



infringe the WWE Marks and to commit unfair competition against WWE by manufacturing, distributing, offering for sale and selling Enjoined Goods at WWE's 2019-2020 live event tour;

**AND IT APPEARING TO THE COURT** that the Enjoined Goods will be located on the premises or within a two-mile radius of WWE's WrestleMania<sup>®</sup> 35 event that will take place on April 7 at MetLife Stadium and on the premises or within a two-mile radius additional WWE-sponsored activities related to WrestleMania<sup>®</sup> 35, such as meet and greets with its Superstars, that will occur on April 5 and 6, 2019 in other parts of New Jersey, as well as on the premises or within a two-mile radius of venues where other WWE events shall be occurring during WWE's 2019-2020 live event tour;

**AND IT APPEARING TO THE COURT** that (1) the Enjoined Goods are goods bearing "counterfeit marks" within the meaning of 15 U.S.C. § 1116(d); and (2) the distribution, sale or offering the sale of the Enjoined Goods would cause confusion or mistake or be likely to deceive and would constitute trademark infringement under 15 U.S.C. § 1114 and would constitute false designation of origin under 15 U.S.C. § 1125(a);

**AND IT APPEARING TO THE COURT** that: (1) WWE is likely to succeed in showing that Defendants have used counterfeit or infringing marks in connection with the sale, offering for sale or distribution of goods or services; (2)

WWE will suffer immediate and irreparable injury and will have no adequate remedy at law if this Court declines to grant an ex parte Seizure Order; (3) the harm to WWE should this Court not grant the requested Seizure Order clearly outweighs any harm which Defendants might incur if the Seizure Order is granted; (4) WWE has not publicized the requested seizure; (5) WWE has given reasonable notice of this Application to the United States Attorney for this District; and (6) WWE has otherwise complied with all statutory requirements for the issuance of an ex parte Seizure Order;

**AND IT APPEARING TO THE COURT** that: (1) it has the authority under 15 U.S.C. § 1116(a), to enjoin trademark infringement under 15 U.S.C. §§ 1114 and 1125(a); (2) to grant, ex parte, a seizure order for goods that bear counterfeits of trademarks and service marks under 15 U.S.C. § 1116(d); and (3) no order other than an ex parte seizure order would adequately achieve the objectives of the Lanham Act, 15 U.S.C. §§ 1114, 1116 and 1125(a);

**AND IT APPEARING TO THE COURT** that notice of this Order need not be given to Defendants because: (1) the identities and whereabouts of Defendants are currently unknown; (2) Defendants have no business identity or stable place of business before or after WWE's wrestling events and cannot be identified; and (3) Defendants who can be located and identified likely will cause

the immediate concealment or destruction of the Enjoined Goods or removal of the Enjoined Goods outside the access of this Court;

**IT IS HEREBY ORDERED** that Defendants, various John Does, Jane Does and XYZ Companies, their true identities being unknown, show cause before this Court, at 50 Walnut Street, Newark, New Jersey 07101, in Courtroom \_\_\_\_, on the \_\_\_\_ day of April, 2019, at \_\_\_\_ a.m./p.m., or as soon thereafter as counsel can be heard, why an order should not be entered granting WWE a preliminary injunction enjoining Defendants, and all those acting in concert with them, from manufacturing, distributing, offering for sale, or selling the Enjoined Goods and/or raise any objection concerning any seizure effected pursuant to this Order; and

**IT IS FURTHER ORDERED** that, effective at 12:01 a.m. on April 4, 2019:

1. Defendants, various John and Jane Does and various XYZ Corporations, along with their partners, associates, agents, servants, employees, representatives, and assigns, and all others under their control or in active concert or participation with them, and all other persons and entities having actual knowledge hereof be, and the same hereby are, temporarily ENJOINED and RESTRAINED from:

- (a) selling, offering for sale, holding for sale, distributing, or offering to distribute any Enjoined Goods which have not been

authorized by Plaintiff and which bear the WWE Marks, including, but not limited to, WORLD WRESTLING ENTERTAINMENT<sup>®</sup>, WWE<sup>®</sup>, WRESTLEMANIA<sup>®</sup>, and the WWE<sup>®</sup> logo.

- (b) representing by any method whatsoever that the Enjoined Goods were sponsored, manufactured, sold or licensed by WWE and otherwise taking any action likely to cause confusion, mistake or deception on the part of the public as to the origin of the Enjoined Goods.

2. Federal, state, and local law enforcement officers are hereby authorized and directed to seize any and all Enjoined Goods and any records documenting the manufacture, sale or receipt of the Enjoined Goods, in the possession, dominion or control of Defendants, their agents or persons acting in concert or participation with them. All seized items shall be delivered up to the care and custody of Plaintiff or Plaintiff's attorneys pending further instructions from the Court. The seized goods shall be kept in identifiable containers.

3. Federal, state, and local law enforcement officers acting hereunder are authorized to carry out the foregoing on the premises or within a two-mile radius of the venues where WWE's WrestleMania<sup>®</sup> 35 Weekend Events shall be occurring in the New Jersey area from April 5 through April 7, 2019, including, but not limited to, MetLife Stadium.

4. Defendants shall cooperate during any such seizure hereunder, shall provide the items sought to be seized wherever such items are maintained and shall

provide their correct names, residential and business addresses and telephone numbers.

**IT IS FURTHER ORDERED** that this order is conditioned upon Plaintiff's filing with the Clerk of this Court an undertaking, in the form of a cash bond, corporate security bond or other form approved by the Court, in the amount of \$\_\_\_\_\_ to secure the payment of such costs and damages, not to exceed such sum, as may be incurred or suffered by any party who is found to have been wrongfully restrained hereby; and

**IT IS FURTHER ORDERED** that simultaneously with any seizure made pursuant to this Order, or as soon thereafter as is practical under the circumstances, each Defendant shall be served with a copy of this Order together with the Summons and the Verified Complaint in this action and shall be offered a receipt reflecting the Enjoined Goods seized.

Dated: March \_\_\_, 2019

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U.S. District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that the within NOTICE TO UNITED STATES ATTORNEY OF MOTION FOR EX PARTE SEIZURE ORDER was served this 28th day of March 2019 by hand delivery upon the United States Attorney for the District of New Jersey, at the address below:

U.S. Attorney's Office  
970 Broad Street, 7th Floor  
Newark, NJ 07102

s/Loly G. Tor

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Loly G. Tor  
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